



Accrediting Commission of Career Schools and Colleges

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[www.accsc.org](http://www.accsc.org)

October 1, 2020

**ELECTRONIC DELIVERY**

[Redacted]

Vogue International Academy  
14099 Westheimer Road  
Houston, Texas 77077

**School #M072454**  
**Warning**

Dear [Redacted]

At the August 2020 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation submitted by Vogue International Academy (“VIA”) located in Houston, Texas. Upon review of the June 3, 2020 On-site Evaluation Report (“OER”) and the school’s response to that report, the Commission voted to place VIA on **Warning** with a subsequent review scheduled for ACCSC’s February 2021 meeting.<sup>1</sup> The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

The Commission found that the school’s response fell substantially short of the expectation to demonstrate compliance with accrediting standards, as enumerated throughout the remainder of this letter. Overall, the response indicates a lack of attention to the school’s obligation to demonstrate compliance with accrediting standards. The fundamental and critical nature of this obligation is established in the *Introduction* to the *Standards of Accreditation*, as follows:

*Because the burden rests with the school to establish that it is meeting accrediting standards, a school must supply the Commission with complete, truthful, and accurate information and documentation showing the school’s compliance with all accrediting standards if the school is to be granted and maintain accreditation. A high level of reliance is placed upon information, data, and statements provided to the Commission by a school.*

In addition, the Commission found that the school’s response raises a question as to whether the management team has demonstrated the ability to lead and manage VIA in compliance with accrediting standards. The Commission expects that VIA will take this additional opportunity to assess school operations in the areas identified below and to provide complete documentation demonstrating compliance with accrediting standards. The areas of concern and the response requirements follow below.

1. VIA did not demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and the discharge of obligations to its students and the school must prepare a financial budget for each fiscal year that allocates working capital for expenditures required to ensure the proper operation of the school and the discharge of its obligations to students as well as for institutional improvement and faculty development activities (*Section I (C)(1-2), Substantive Standards, Standards of Accreditation*). [Redacted]

- [Redacted]

<sup>1</sup> The accreditation process provides an opportunity for an institution to demonstrate its commitment to continuous improvement. Accordingly, the Commission’s final decision letter on this matter will include an ACCSC Institutional Enhancement Enclosure which lists suggestions deserving the school’s immediate attention and action.

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]

- ■ [REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

2. VIA must demonstrate that the school engages in ongoing institutional assessment and improvement activities and planning that support the management and administration of the school as well as the quality of the education provided (*Section I(B)(1-2), Substantive Standard, Standards of Accreditation*). According to the OER, VIA did not provide documentation to the on-site evaluation team showing the school’s ongoing institutional assessment and improvement activities and planning. In response to the OER, the school provided a very brief outline titled “Institutional Assessment and Improvement Plan.” The Commission found, however, that the outline is insufficient to show compliance with standards, in the following areas:

- The outline has no description of the school’s institutional assessment, which is an essential part of the process;
- The outline does not identify goals for improvement, benchmarks to measure progress against, or timelines to indicate when improvements will be made;
- The outline only identifies the following areas: 1) Academic Assessment and 2) Support and Services Areas Assessment and fails to address improvement and planning activities in the areas of management; fiscal condition and budget; administrative policies and practices; emergency preparedness; student support services; faculty and staff development; educational program curricula; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes.

As such, the Commission found that VIA did not demonstrate that the school engages in ongoing institutional and assessment and improvement activities that include all areas of the school’s operations.

Based on the foregoing, the Commission directs VIA to review the monograph [Institutional Assessment and Improvement Planning/Implementation](#) available on the ACCSC website and to submit the following:

- a. A description of the school’s institutional assessment and planning activities which includes **detailed** evidence of goal setting, benchmarking, and implementation activities appropriate to the size and scale of the school’s operations *Section I (B)(2), Substantive Standards, Standards of Accreditation*;
  - b. A list of all institutional improvement activities that took place between January 1, 2020 and December 1, 2020 and documentation of each activity listed; and
  - c. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s institutional assessment and improvement requirements.
3. VIA must demonstrate successful student achievement rates through verifiable records of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school does not obtain verifiable records of initial

employment of its graduates and recommended, as part of the school’s response, that VIA submit documentation for students that graduated between March 1, 2020 and May 31, 2020. In response, VIA stated that due to the pandemic, the school did not have any graduates who were placed during the timeframe recommended in the OER. The school also stated that VIA uses a third-party verification process for all graduates; however, the Commission reminds the school that third-party verification does not take the place of the school’s responsibility to itself maintain verifiable records of initial employment. As such, the Commission is interested in obtaining additional information with regards the school’s process and procedures for obtaining verifiable records of initial employment.

Accordingly, the Commission directs VIA to submit the following:

- a. A description of the school’s process and procedures for recording and verifying graduate employment to include information for self-employment and career advancement, if appropriate;
- b. The current verification form or other tool the school is currently utilizing to verify employment;
- c. For each graduate who gained employment in the career field for which the school provided education between January 20, 2020 and October 31, 2020, submit the following information:

Count	Graduate ID	Program	Start Date	Employer, Contact, Address, & Phone#	Date of Initial Employment	Descriptive Job Title
1	12345	HVAC Technician	01/10/2018	HVAC Repair Industries, John Doe, 123 Sample Way, Anywhere, MD 222.333.1234	2/1/2018	HVAC Technician
2	23456	HVAC Technician	01/10/2018	HVAC Repair Industries, John Doe, 123 Sample Way, Anywhere, MD 222.333.1234	2/1/2018	HVAC Technician

- d. The following supplementary information:
    - i. A copy of the school’s completed verification form (as indicated in item (b.) above) for each graduate employed listed in chart (c.) above;
    - ii. For each graduate classified as self-employed, a signed statement from the graduate verifying that the employment is valid which includes the following:
      - The graduate’s name and contact information;
      - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received; and
      - An attestation that the graduate is earning training-related income; and
    - iii. For each graduate classified as “career advancement,” supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provide by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school.
4. VIA must demonstrate that the school’s programs measured in clock hours include the appropriate number of didactic hours and, as applicable, the appropriate number of supervised laboratory and/or other hours (e.g., outside work/preparation, externship, etc.) necessary to achieve the program objectives (*Section II (A)(3)(b), Substantive Standards, Standards of Accreditation*). In addition, VIA must demonstrate that the school is in compliance with all applicable federal, state, and local

government requirements (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*). The on-site evaluation team reported certain students in unsupervised activities with no active learning, due to rotation between English instruction and Spanish instruction. In response to the OER, VIA stated the following:

*The state of Texas has three languages approved for Cosmetology to be taught in but Vogue caters to both English and Spanish speaking students and therefore, theory is divided into both. When one group is in theory the other group is in the clinical floor getting prepared for their turn in the classroom. While waiting their turn, the students take advantage to studying [sic] or practicing their assignments that have already been given by the teacher previously.*

The Commission understands that the school has elected to teach the theory in both English and Spanish; however, the Commission noted that study or practice time spent by students who are waiting for instruction appears to be counted towards the actual instructional time required to complete the program. Accreditation standards define a clock hour as 50 minutes of instruction in a 60 minute period of time (*Section II (A)(3)(e)(i), Substantive Standards, Standards of Accreditation*). The Commission found that the time students spend in preparing for class without actual instruction does not meet the definition of a clock hour. As such, VIA did not demonstrate that the students complete all the required hours necessary to achieve the program objectives and raises the question whether this practice meets state requirements for licensure.

As such, the Commission directs VIA to submit the following:

- a. Documentation that the instructional time has been modified to ensure that all hours counted towards completion of the program are only those hours in which a student is in the classroom with an instructor and/or in a supervised laboratory, such as providing services or practicing under the supervision of an instructor; and
  - b. Documentation that students meet all instructional requirements of the Texas Department of Licensing & Regulation.
5. VIA must demonstrate compliance with accrediting standards, relative to its learning resource systems (“LRS”) as follows:
- VIA must demonstrate that the use of the learning resource system materials is integrated into the school’s curriculum and program requirements as a mechanism to enhance the education process and to facilitate positive learning outcomes for students (*Section II (A)(7)(c), Substantive Standards, Standards of Accreditation*);
  - VIA must demonstrate that qualified school personnel orient, train, and assist students and faculty in the use of the learning resource system in a manner that supports learning objectives (*Section II (A)(7)(e), Substantive Standards, Standards of Accreditation*);
  - VIA must demonstrate that the school has written policies and procedures for the ongoing development of its LRS as part of its institutional improvement plan (*Section II (A)(7)(f), Substantive Standards, Standards of Accreditation*); and
  - VIA must demonstrate that the school is attentive to its students’ education and other needs (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*).

With regard to integration of the LRS into the school's curriculum, VIA provided sections of a lesson plan. The references to the LRS are limited to: "Refer to LRS books" and "[e]ncourage students to also use LRS or personal cell phones to view online videos of haircutting techniques." However, there does not appear to be any specific assignment(s) that integrate the use of LRS materials. In absence of this information, the school has not yet demonstrated that use of the LRS has been integrated into the school's programs.

With regard to demonstrating that a qualified staff person orients and trains students and faculty about the LRS, VIA stated "[w]hen students attend their orientation one of the main points directed by the instructors is our Learning Resource System (Library). The instructors go in detail as to how they can use all materials for their learning and practicing of the skills they will be displaying." The school did not identify the instructors who conduct the orientation to the LRS or provide documentation that the personnel conducting the orientation have the appropriate qualifications to oversee the LRS. In addition, the school did not provide evidence of the information provided to students during the orientation, or any documentation that such orientation and trainings have occurred.

As noted previously, the school's planning process does not include assessment and planning as it relates to the school's LRS and VIA did not provide any supplemental information about the policies and procedures for the ongoing development of the LRS in the response.

Finally, with regard to meeting student needs, the student survey conducted at the time of the on-site evaluation found that 33% of the students surveyed expressed dissatisfaction with the school's LRS. In response, VIA stated that the school surveys the students twice per year to "ensure that the students [*sic*] use of the LRS is to their satisfaction." While the Commission recognized that the school employs this mechanism to obtain regular feedback, it was not clear to the Commission whether the school has responded to the area of student dissatisfaction identified by the on-site evaluation. The response does not show that the school has assessed student needs in this area, or formulated a plan of action to address those concerns.

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

- a. Updated sample of course outlines/syllabi showing the integration of LRS materials including detailed descriptions of assignments and projects that require the use of the LRS;
- b. A list of the qualified staff person(s) responsible for orienting and training students and faculty about the LRS and a description of their qualifications for this role;
- c. A detailed explanation as to how and when the school conducts trainings and orientations on the use of the LRS for students and faculty, including an outline of the topics covered during the orientation;
- d. Documentation of the most recent orientation provided to students and faculty on the use of the LRS;
- e. The school's written policies and procedures for the ongoing development of the LRS and documentation of any materials and improvements made to the LRS since the on-site evaluation;
- f. An assessment of the factors impacting student satisfaction in the area of LRS and the school's plan of action for addressing those factors;
- g. The results of a survey sample of not less than 50% of the student population using either the ACCSC student survey tool or one that is substantially similar that includes the following:

- i. A description of the student survey process and a copy of the survey instrument used;
    - ii. A detailed analysis of the student survey results with a particular focus on any results that show less than 80% satisfaction; and
    - iii. A detailed narrative of the school’s plan to address any areas of student dissatisfaction, if applicable; and
  - h. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s accrediting standards relative to the LRS.
6. VIA must demonstrate that faculty engage in ongoing professional development activities that support the quality of education provided and enhance student learning and achievement (*Section III (A)(2), Substantive Standards, Standards of Accreditation*). In response to the OER, VIA stated that the two faculty that the on-site evaluation team found without professional development activities were “relatively new hires to the School [*sic*].” VIA stated that no professional development had been identified for any faculty due to COVID-19 and the school planned to identify training when “the crisis passes.” The Commission understands that professional development activities may be impacted by the current pandemic; however, the response does not include the school’s policy and procedures for ensuring on-going faculty development. Specifically, VIA did not provide its general requirements for on-going faculty development such as evidence of memberships in trade and professional organizations; in-house training programs; and requirements for attending professional meetings and/or training. As such, the Commission is interested in obtaining additional information as to the school’s expectations for faculty to engage ongoing professional development activities that support the quality of education provided.

As such, the Commission VIA to submit the following:

- a. A copy of the school’s faculty development policies and procedures;
    - b. Copies of the individual faculty development plan for each of the faculty identified in the OER and evidence any activity completed, if available; and
    - c. Any other information the school deems necessary to report on its continued efforts to demonstrate its faculty and educational administrators engage in ongoing faculty assessment and professional development activities.
7. VIA must demonstrate compliance with accrediting standards relative to admissions practices as follows:
- VIA must demonstrate that the school avoids permitting personnel whose primary responsibilities include recruiting and admissions activities to become involved in admission decisions, including signing and accepting the enrollment agreement (*Section IV (A)(13), Substantive Standards, Standards of Accreditation*).
  - VIA must demonstrate that personnel whose primary responsibilities that include recruiting and admissions activities are not permitted to assist prospective students in completing application forms for financial aid (*Section IV (A)(12), Substantive Standards, Standards of Accreditation*).

- VIA must demonstrate that admissions documentation for students from foreign countries is translated and certified to be at least equivalent to a U.S. high school diploma (*Appendix V, Substantive Standards, Standards of Accreditation*).

In response to the on-site evaluation team’s concern that the administrators have overlapping responsibilities in admissions, financial aid, and accepting students via executing the enrollment agreement, VIA provided a description of the admissions procedures and stated “[t]he VIA Campus Director will approve final acceptance of the students [*sic*] enrollment at the school by signing the official enrollment agreement and by not engaging in recruiting or admissions activities.” However, the school did not provide sufficient evidence – such as updated job descriptions for the management team – that clearly shows each person’s role in recruiting, admissions, financial aid, and executing enrollment agreements. In addition, as no students were admitted since the on-site evaluation due to the pandemic, the school was unable to demonstrate that the enrollment agreements are now signed by the Campus Director.

The on-site evaluation team also found that the school did not in all instances have documentation that the foreign credentials were certified as equivalent to a U.S. high school diploma. In response to the OER, VIA provided a description of the admissions process which states that students must have “a high school diploma, GED or translations of home country studies” before signing an enrollment agreement. Although the procedures refer to translation, the school’s admissions process does not clearly require that foreign credentials must be certified as equivalent to a U.S. high school diploma. As noted above, the school had not enrolled any new students at the time of its response to the OER and was thus unable to demonstrate that foreign transcripts are certified as equivalent to a U.S. high school diploma.

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

- Updated job descriptions for the administrative team, specifically detailing responsibilities in the areas of recruitment, admissions, and financial aid as appropriate;
- A copy of the school’s admission policies and procedures related to admissions requirements for international students;
- A roster of all students enrolled and allowed to begin attending classes from September 1, 2020 through November 1, 2020 as follows:

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

- A copy of the admissions documentation, such as proof of high school graduation or its equivalency, a translation of the document, if applicable, the credential evaluation report, and signed Enrollment Agreement for all students captured on the above roster; and
  - Any additional information or documentation that the school believes will be useful to demonstrate the school’s compliance with ACCAC’s admissions requirements.
- VIA must demonstrate that the school discloses the graduation and graduate employment rate for each program as last reported to the Commission that includes the program population base and time frame upon which each rate is based (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*).

VIA did not provide a response to the on-site evaluation team's finding and therefore the Commission directs VIA to submit the following:

- a. A description of how the school makes the required disclosures regarding graduation and graduate employment rates and
  - b. Documentation showing that the graduation and graduate employment rates as last reported to the Commission are disclosed to prospective and current students.
9. VIA must demonstrate that the school complies with accrediting standards with regard to cancellation and refund policies, in the following areas:
- Each school must have and apply a fair and equitable refund policy (*Section I (D)(5), Substantive Standards, Standards of Accreditation*);
  - All monies paid by an applicant must be refunded if requested within three days after signing an enrollment agreement and making an initial payment (*Section I (D)(4)(b), Substantive Standards, Standards of Accreditation*); and
  - The refund policy is disclosed consistently in the catalog and enrollment agreement and that the catalog and enrollment agreement shall not be in conflict (*Section I (D)(6), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team raised a question as to whether the school consistently applied its refund policy to both cash-pay students and those receiving financial aid. Although in response to this finding the school provided a copy of the refund policy, the school did not address the issue of how the policy is applied. The refund policy described in the response appears to be similar for both cash-pay students and those receiving financial aid; however, as the school did not have any withdrawals during the timeframe of the response, the school was unable to demonstrate the policy was fairly applied to both categories of payment.

Moreover, the on-site evaluation team reported that the school disclosed several “non-refundable fees” in the cancellation and refund policies, which imply that applicants may not receive a return of all monies paid if cancellation is requested within three days after signing an enrollment agreement and making an initial payment. Although VIA provided a description of a revised refund policy, the school did not provide its catalog and enrollment agreement showing the inclusion of the revised policy and language regarding “non-refundable” fees in these documents. In addition, in absence of the catalog and enrollment agreement, VIA did not demonstrate that the cancellation and refund policies are consistently disclosed in both documents.

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

- a. A copy of the school's catalog and enrollment agreement cross-referenced to the respective ACCSC Catalog Checklist and the ACCSC Enrollment Agreement Checklist
- b. An ACCSC Refund Report for all students who were either dismissed or withdrew between April 1, 2020 and November 30, 2020 to include the enclosed
  - i. ACCSC Refund Report Summary Sheet;
  - ii. Refund Report Worksheet;

- iii. Completed attendance tracking forms to include documentation of approved leaves of absence (as applicable); and
  - iv. Copies of all electronic refund transactions and/or checks – front and back – issued to the purpose of student records; and
  - c. An explanation for any student for whom a refund was not made in accordance with the school’s refund policy.
10. VIA must demonstrate that the school publishes in its catalog and enforces a policy of acceptable student satisfactory progress (*Section VII (A)(3), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school had different satisfactory academic progress policies for students receiving federal financial aid and cash-paying students. This appeared to the on-site evaluation team to result in inconsistent assessment of student learning. In response, VIA described how the school monitors satisfactory academic progress indicating that students must maintain “at least a 70% average throughout the training period” and defining the grading period as a month. If “the average for the previous monthly evaluation is 69 or lower; the student will be placed in academic probation” and must improve the grading percentage to 70% in the subsequent month. The policy states:

*If a student continues to maintain unsatisfactory academic progress, averaging 69 or below, they will be kept under probation for another month. At this time, the student will be responsible for completing all extra credit work for those monthly chapters. If a student does not make the proper arrangements, the current earned grades will be officially recorded and student will be suspended or terminated.*

Although the school stated that this SAP policy is applied to both “Non-Title IV recipients and those eligible for Title IV aid,” the Commission found two funding-specific statements within the response that do not make it clear that the school applies one policy consistently to all students.

*...students that are cash pay and are not meeting SAP, they will have the opportunity to better their grades. The Education Department will have to place the student on probation if the students’ grades do not show improvements. Although, they continue to pay on a monthly basis because they are still committed to do so regardless of them not meeting SAP.*

*Even though Vogue International Academy Education Department will monitor a student’s academic progress every month, Financial Aid will only recalculate SAP at the end of each payment period. The student will be evaluated when they have completed the actual hours for that payment period. At this evaluation point the student must have as an accumulative G.P.A. of 70% or higher in order to comply with the policy. Because the Education Department is checking a student’s progress every month, this will make it easier to ensure that the student who is not meeting SAP will get the appropriate help to get out of their unsatisfactory status. The Education Department will conclude that the student not making SAP will be placed on academic probation, if the student at the end of a payment period is not meeting SAP then the financial aid department will issue a financial aid warning, in which the students’ payment will still be drawn down. At the end of the following payment period the student is still not meeting SAP then the student will be placed on a financial aid suspension. If a student is classified as being on suspension then Vogue will not drawdown any funds for that student since they are not eligible to receive a payment. Regardless of when the Education Department removes a student from their monthly academic probation, the financial aid office will ALWAYS re-evaluate and re-calculate Title IV eligibility of a student at the end of each payment period.*

The policy for cash-pay students appears to allow students that are not making satisfactory progress to remain in school as long as monthly tuition payments are maintained; which is not consistent with the consequences for federal financial aid recipients. Although the students participating in federal financial aid do not receive federal financial assistance payments while on academic probation, there is no indication that the students make any other type of tuition payments. Further, it is unclear how long students may continue to attend school while failing to make satisfactory academic progress, but the practice appears to be that students are allowed to remain in the program until such time as the student is enrolled in the program for more than 150% of the allotted time to complete the program.

The Commission found that the statements regarding separate policies for cash-pay students and federal financial aid recipients raises a question as to whether the school consistently applies its student learning assessment and academic progress monitoring policies. In addition, the Commission noted a lack of established timeframes within which students will be terminated for failure to satisfactorily acquire the minimum knowledge, skills, and competencies required by the program objectives. As such, it appears that students may be enrolled in the program, incurring tuition costs, with no ability to successfully complete the program and earn a credential.

Based on the foregoing, the Commission directs VIA to revise the SAP policy and submit the following:

- a. The school's revised SAP policies as stated in the catalog;
  - b. A detailed description of the consequences a student undergoes for not meeting satisfactory progress minimums (i.e., revised probation and termination policies that make consequences clear) and the impact not meeting satisfactory progress minimums has on enrollment in the program;
  - c. A list of all students enrolled at VIA between March 1, 2020 through November 30, 2020;
  - d. Copies of completed cumulative academic progress documentation (e.g., the school's Satisfactory Academic Progress Reports) for each student listed in (c.) above demonstrating that the school adheres to the published policies (e.g., Academic Warning notices); and
  - e. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements regarding SAP policies.
11. VIA must demonstrate that the school utilizes an enrollment agreement that includes, at a minimum, all items required by the ACCSC Enrollment Agreement Checklist and which clearly states the obligations of both the student and school (*Section IV (C)(2)(a), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the enrollment agreement provided at the time of the on-site evaluation did not include any policy changes with regard to refunds if an applicant cancels enrollment within three days of signing the agreement and did not include all items as required on the ACCSC Enrollment Agreement Checklist. In addition, the on-site evaluation team found that the school changed printed start dates without obtaining acknowledgement signatures by the student and accepting school official acknowledging the change. In response to the OER, VIA did not address the items identified by the team and only provided a blank copy of the initial and signature page of the enrollment agreement to demonstrate that "both enrollment agreement and catalog has been provided to the student before or at time of registration." VIA did not provide an explanation regarding the procedures for updating any changes to a fully executed enrollment agreement or any changes made to the school's policies or procedures in light of the on-site evaluation team's findings. In addition, the school failed to provide a copy of a revised enrollment agreement to demonstrate that the enrollment agreement contains all required items on the ACCSC Enrollment Agreement Checklist. While the

school noted previously in the response that new students have not been enrolled due to the pandemic, the Commission is interested in ensuring that the school has and utilizes an enrollment agreements that includes all items as required on the ACCSC Enrollment Agreement Checklist.

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

- a. A copy of the school’s internal process and procedures for enrolling and executing enrollment agreements including a description as to when and how the applicant and school official acknowledge any changes to the fully executed enrollment agreement;
- b. The school’s enrollment agreement fully cross-referenced to the ACCSC Enrollment Agreement Checklist provided in response to Item #10 above;
- c. A roster of all students that started classes since July 1, 2020:

Student ID	Program Name	Program Start Date	Date All Admissions Documentation was Secured	Date Enrollment Agreement was Signed and Accepted by the School

- d. Copies of the enrollment agreements for each student identified in chart (c.) above;
- e. An explanation for any student for whom an enrollment agreement was executed after the start date of class;
- f. Any additional documentation to demonstrate that the school’s policies and procedures are in compliance with the accrediting standards cited above.

**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.

VIA 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.<sup>2</sup> 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.

VIA 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 December 10, 2020**. If a response, the required fee,<sup>3</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission’s office **on or before December 10, 2020**, 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]

Encls: ACCSC Refund Report Summary Sheet  
ACCSC Refund Report Worksheet and Glossary

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<sup>2</sup> 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](http://www.accsc.org).

<sup>3</sup> ACCSC assesses a \$500 processing fee to a school placed on Warning.

**ACCSC REFUND REPORT SUMMARY SHEET**

School Name:  
School Number:  
Refund Report Date Range:

Student Name	Start Date	Last Date of Attendance	Date of Determination of Withdrawal / Termination	Refund Due Date	Date Refund Paid*

\*This is the date that the refund was distributed to or received by either the student or applicable funding source.

## REFUND REPORT WORKSHEET

*A separate worksheet must be completed for each refund made within the time period specified by the Commission.*

Name of student: \_\_\_\_\_ Date of enrollment: \_\_\_\_\_

The maximum number of days for which the school must disburse refunds, as defined in the school's refund policy:	
Based upon the school's refund policy, select (a) or (b) below and enter the date the school used to calculate the number of days required to disburse the refund:	
<b>(a) Last date of attendance</b>	
<b>(b) Date of determination of termination/withdrawal</b>	
Date of refund disbursement:	
The actual number of days between (a) or (b) above and the date the school disbursed the refund:	

Attach to this worksheet a detailed explanation for why the refund was late (if applicable).

<b>Length of program or period of enrollment:</b>	
<b>Percentage of program or period of enrollment completed:</b>	%
<b>Total tuition for program or period of enrollment:</b>	\$
total amount of tuition collected:	\$
percentage of total tuition collected:	%
percentage of collected tuition retained (c):	%
percentage of collected tuition refunded (d):	%
<b>Amount of refund</b>	\$

Attach to the school's submission:

- One copy of the school's withdrawal/refund policy and attendance policy, as it appears in the school's catalog, must accompany the school's submission. If the school uses one or more state refund policies, please attach a copy of each state's refund policy. One copy per state will suffice for the entire Refund Report.
- The Refund Report Summary Sheet for all refunds included in this report.

Attach to this worksheet:

- Copy of the calculation sheet(s) showing how the refund was calculated,
- Copy of the front and the back of the refund check(s) or electronic transmission document(s).

## THE REFUND REPORT WORKSHEET GLOSSARY

**Name of student:** As it appears on the signed Enrollment Agreement.

**Date of enrollment:** The date the Enrollment Agreement was signed.

**Last date of attendance (a):** The last day the student attended class.

**Date of determination of termination/withdrawal (b):** The date the student's enrollment was terminated either by voluntarily withdrawal or by termination by the school.

**Date of refund disbursement:** The date the refund check was processed and disbursed or electronically transmitted (Pell accounts).

**Length of program or period of enrollment:** The total length of the program, or period of enrollment for which tuition is charged, measured in either weeks, months, or clock hours, whichever is most appropriate for refund calculation purposes.

**Percentage of program or period of enrollment completed:** Length of the total program, or period of enrollment for which tuition is charged, completed divided by the amount of the length of the program or period of enrollment for which tuition is charged uncompleted.

**Total tuition for program or period of enrollment for which tuition is charged:** The total tuition cost for the program, or period of enrollment for which tuition is charged. This amount does not include application fees, books, supplies, uniforms, etc., unless those items are completely refundable by the school.

**Total amount of tuition collected:** The amount of refundable monies collected.

**Percentage of total tuition collected:** The percentage of refundable monies collected.

**Percentage of collected tuition retained (c):** The percentage of refundable monies collected that was retained by the school for training received by the student.

**Percentage of collected tuition refunded (d):** The percentage of refundable monies collected that was returned to the student, or to financial aid accounts on behalf of the student, for training which was purchased but not received by the student. Items (c) and (d) should total 100%.

**Amount of refund:** The dollar and cents amount of the refund.