



Accrediting Commission of Career Schools and Colleges

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March 22, 2021

ELECTRONIC DELIVERY

[Redacted]

Arkansas Beauty College
109 North Commerce Avenue
Russellville, Arkansas 72801

School #M070721
Warning

Dear [Redacted]

At the February 2021 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to defer action on the Application for Renewal of Accreditation submitted by Arkansas Beauty College (“ABC”) located in Russellville, Arkansas. Upon review of the September 30, 2020 Commission deferral letter and the school’s response, the Commission voted to place ABC on **Warning** with a subsequent review scheduled for ACCSC’s August 2021 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

As an initial matter, the Commission did recognize the effort made by ABC to respond to the Commission’s concerns and questions. However, overall the Commission found that the school’s response was difficult to navigate and not organized as per ACCSC’s Instructions for Electronic Submission (*Section I (H)(1)(b) Rules of Process and Procedure, Standards of Accreditation*).¹ While the response contains bookmarks as required and a table of contents with links to each item listed in the table of contents, the restatement of each item listed in the Commission’s letter is not followed by the school’s narrative response. The responses to the findings appear on consecutive pages, and as a result it is not immediately clear in the subsequent pages what all exhibit pages represent.

Additionally, as a general observation that applies throughout the school’s response and is of significant import, ABC’s responses do not provide a sufficient enough description of its policies, procedures, detail as to how those policies and procedures meet ACCSC standards, or documentation to demonstrate implementation. For example, it is not enough to simply state that the school has a library without describing how that library, in the context of a learning resource system, is appropriate and adequate given the size of the school, scope of the programs, and level of education provided. This is a general rule that the school should apply when answering each question. The school’s most recent response leaves the Commission with insufficient information to make critical assessments as to whether ABC meets ACCSC’s accreditation standards. The how and the why, the descriptive and explicative, are critical elements of a school’s response.

According to *Section I (F), Rules of Process and Procedure, Standards of Accreditation*, “[b]y applying for renewal of accreditation, a school accepts and agrees to the terms set forth in the ACCSC Application for Accreditation and accepts and agrees that the responsibility rests with the school to demonstrate continuous eligibility for accreditation and compliance with accrediting standards and requirements as set forth in the *Standards of Accreditation*.” Moreover, *Section I (G)(1) Rules of Process and Procedure, Standards of Accreditation*, states in order to maintain eligibility for accreditation the school accepts the obligation to

¹ Whenever possible, ABC should directly convert documents to PDF as opposed to scanning and creating PDFs from paper documents. The direct conversion of documents to a PDF format allows for far greater readability. For example, complete the narrative response using word processing software (e.g., MS Word), convert the Word document directly to a PDF file, and then combine the converted file with other converted or scanned documents into a single PDF document.

demonstrate continuous compliance with the *Standards of Accreditation* and that the burden rests with the school to establish that it is meeting the standards. Moreover, the Commission’s deliberations and decisions are made on the basis of the written record of an accreditation review. Schools do not have the right to appear before the Commission. Accordingly, ABC must supply the Commission with complete information. The Commission determined that ABC did not in all cases demonstrate that the school has met this burden and obligation to such a scale that a Warning is warranted at this time.

1. ABC must demonstrate adequate management and administrative capacity that includes full-time on-site supervision by an individual or team with the demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*) and appropriate administrative and operational policies and procedures to which the school adheres and reviews and updates as needed (*Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*). In response to the deferral letter, the school submitted a management organizational chart and school-wide organizational chart, and a description of how the school develops and updates ABC’s policies and procedures, stating the following:

The director periodically reviews the policy and procedures manual. If any policies or procedures need to be updated or if the director received a new law or any changes. Once the director has gone over the information (Policies and procedures) the director will call a staff meeting and go over the law, changes or policy and procedure that need to be addressed. The director and staff will work together to develop a policy and procedure. The director oversees that the faculty and students follow to the best of its ability. Issues that arise can be referred back to the policy and procedure manual and /or student catalogue to ensure equality throughout. As policies and procedures become out dated, the director updates the policies and procedures manual as they need to be adjusted, or become out dated, the Director will call a staff meeting and go over the policies and procedures that need changes. Once the Director and Staff updates and reprints the policies and procedures manual in the catalogue We distributes the new policies and procedure to each student. So, they are notified of the changes.

The Commission reviewed ABC’s response and found that while the school provided organizational charts to show the management structure of the school, the response is lacking in detail and does not demonstrate the adequacy of ABC’s management structure. The Commission believes that ABC’s inability to satisfactorily address this issue specifically – and more generally the majority of the findings from the deferral letter – to be evidence that the school’s administrative capacity may be insufficient for an ACCSC-accredited school.

The deferral letter identifies findings in the areas of management, student achievement, verification of faculty qualifications, refund policy disclosure, and student transcripts. In response, the school failed to address the majority of those findings as described in this letter, despite being provided with specific guidance on how to do so. It again is not clear, from the nature of the school’s response, that ABC’s leadership has demonstrated the ability to manage a postsecondary educational institution in compliance with accrediting standards. ABC is advised that the Commission will take into consideration the quality of the school’s overall response to this letter as an indicator of the school’s demonstrated ability to manage ABC in compliance with standards.

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

- a. A detailed description of the management structure at the school, including a current organizational chart;
 - b. An updated description of how ABC’s policies and procedures are developed, including the individuals responsible for establishing policies and procedures; the individuals responsible for monitoring the execution of policies and procedures; and the individuals responsible for recordkeeping;
 - c. A detailed description of how the school believes ABC’s management structure is adequate to manage a postsecondary education institution; and
 - d. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s management and administrative capacity requirements.
2. ABC must demonstrate successful student achievement by maintaining acceptable rates of graduation and employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the deferral letter in which the school was directed to submit Graduation and Employment Charts for all current program schedules for the Instructor Training and Manicuring programs, the school reported the following student achievement rates using a July 2020 Report Date on the Graduation and Employment Charts:

Program	Length in Months	ABC Graduation Rate	ACCSC Benchmark Graduation Rate	ABC Employment Rate	ACCSC Benchmark Employment Rate
Instructor Training*	5	100%	73%	100%	70%
Instructor Training	7	**	60%	**	70%
Manicuring*	5	100%	73%	100%	70%
Manicuring*	7	100%	60%	100%	70%

* The school reported two or fewer starts on the Graduation and Employment Chart.

** There were no starts during the reporting period using a July 2020 Report Date.

The Commission found that ABC reported the graduation and employment rates above that meet ACCSC’s student achievement benchmark rates. The Commission noted, however, that the Graduation and Employment Charts provided in the school’s response differ from the graduation and employment rates reported in the school’s 2020 Annual Report, also using a July 2020 Report Date, as follows:

Program	Length in Months	ABC Graduation Rate	ACCSC Benchmark Graduation Rate	ABC Employment Rate	ACCSC Benchmark Employment Rate
Cosmetology	12	56%	55%	100%	70%
Instructor Training*	6	50%	73%	0%	70%
Manicuring	6	100%	73%	100%	70%

* The school reported two or fewer starts on the Graduation and Employment Chart.

The Commission determined that because the school provided different program schedules in ABC’s deferral response and the school’s 2020 Annual Report, the school must submit additional information in order to demonstrate that the school’s student achievement is reported accurately.

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

- a. A description of the schedules for each of the school’s program offerings (i.e., the program length(s) of each program offered at the school);

- b. Graduation and Employment Charts for the Cosmetology, Instructor Training, and Manicuring programs using a **July 2021** Report Date;
- c. Summary information for the Graduation and Employment Charts organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
 - i. For each student start, provide the following information:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Cosmetology	01/10/17	06/01/2018	N/A
2	12346	Cosmetology	01/10/17	N/A	01/10/2018

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

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

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

Count	Graduate ID	Program	Start Date	Employer, Contact, Address, & Ph. #	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ³ (i.e., graduate or employer)
1							

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

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

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

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

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

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

and

- d. Any additional information, to include contemporaneous retention, graduation, or employment data, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s student achievement outcomes requirements.

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.

3. ABC must demonstrate that the school's refund policy is disclosed consistently in its catalog and enrollment agreement (*Section I (D)(6), Substantive Standards, Standards of Accreditation*) and makes refunds in accordance with that policy (*Section I (D)(5), Substantive Standards, Standards of Accreditation*). In response to the deferral letter, ABC submitted a copy of the school's refund policy as stated in the catalog and enrollment agreement; documentation regarding the school's process and procedures for processing refunds; a statement regarding the school staff member charged with processing refunds, including professional experience and plans to receive federal student aid training; and documentation for all refunds issued to students from May 1, 2020 to October 31, 2020. The Commission reviewed the school's response and found that the documentation is lacking in detail and does not clearly describe the school's policies and procedures, including whether the school uses the last date of attendance or a date of determination to determine the refund due date. Also, the school did not demonstrate that financial services staff have received training on processing refunds.

Therefore, the Commission determined that additional information is required in order to provide the school an additional opportunity to demonstrate that ABC's refund policies comply with accrediting requirements. The school must ensure that ABC's response makes clear the relationship between the Commission's directives and the school's response in terms of both ABC's narrative and supporting documentation. The school is also advised to remain attentive to federal requirements with respect to the issuance of refunds. In this regard, and in light of fact that the school has not clearly outlined ABC's policies and procedures for issuing refunds, the Commission also determined that the school should submit an additional sample of student refund documentation in order to demonstrate ABC's compliance with accrediting requirements.

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

- a. An updated copy of the school's refund policy as stated in both the catalog and enrollment agreement;
 - b. An updated copy of the school's policies and procedures for processing refunds;
 - c. Documentation showing that applicable financial services staff have received training on processing refunds;
 - d. Refund information for all refunds issued to students who were either dismissed/terminated or withdrew between November 1, 2020 to April 30, 2021 to include the enclosed Refund Report Summary Sheet and Refund Report Worksheet, individual attendance records with approved leaves of absences (as applicable), copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student records; written notification of withdrawals (if applicable); and ledger cards for each student;
 - e. An explanation for any student for whom a refund was not made in accordance with the school's refund policy; and
 - f. Any additional information the school believes will be useful to the Commission in making a determination regarding the school's compliance with accrediting standards regarding the school's refund policy and practices.
4. ABC must demonstrate that the school maintains indefinitely a permanent official transcript for all current and formerly enrolled students and that student transcripts include the clock hours earned for each course (*Section VI (B)(2), Substantive Standards, Standards of Accreditation*). In response to the deferral letter, the school submitted a current student transcript; transcripts for ABC's ten most recent

graduates; and a description for accessing and safeguarding student “Personally Identifiable Information.” The Commission reviewed the school’s response and found again that the transcripts do not appear to include the clock hours earned for each course or the date/term of courses taken. Therefore, the Commission determined that additional information is required in order to provide the school an additional opportunity to demonstrate that ABC’s student transcripts include all items required by accrediting standards.

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

- a. A copy of a revised transcript, showing that the document now includes all elements required by accrediting standards;
- b. Copies of transcripts with all required information for the school’s ten most recent graduates; and
- c. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards regarding the school’s student transcripts.

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.

ABC 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.⁴ 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.

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.accsc.org.

ABC 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 response must also include a signed certification attesting to the accuracy of the information and be received in the Commission’s office **on or before June 10, 2020**. If a response is not received in the Commission’s office **on or before June 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]
[REDACTED]