



Accrediting Commission of Career Schools and Colleges

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December 16, 2022

**ELECTRONIC DELIVERY**

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██████████

United College of Health and Beauty  
4219 South Broadway  
Englewood, Colorado 80113

**School #M072489**  
**Warning**

Dear ██████████:

At the November 2022 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation submitted by United College of Health and Beauty (“UCHB”) located in Englewood, Colorado. Upon review of the September 5, 2022 On-site Evaluation Report (“OER”) and the school’s response to that report, the Commission voted to place UCHB’s on **Warning** with a subsequent review scheduled for ACCSC’s **May 2023** meeting. The reasons for the Commission’s decision and the Commission’s requirements UCHB to demonstrate compliance are set forth below.

Overall, the Commission found that the school’s response failed to demonstrate compliance with accrediting standards in 24 areas out 25 areas identified in the OER. The Commission also expressed concern that several of the current findings are repeat findings from the school’s initial accreditation review in 2017. Additionally, the Commission found that seven items included as Institutional Enhancement Enclosures as part of the grant of initial accreditation in May 2019 resulted in concerns from the evaluation team as listed in the September 5, 2022 OER. Based on the concerns listed herein, the Commission questioned whether UCHB’s leadership has proven to have the ability to lead and manage an accredited post-secondary institution.

Participation in the process of accreditation is voluntary on the part of the school (*Section I (B)(1)(f), Rules of Process and Procedures, Standards of Accreditation*). Accreditation serves as an indication of institutional quality by setting standards against which all career schools and colleges can be measured. The burden rests with the school to establish that it is meeting those 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 accreditation. As stated in *Section I (F), Rules of Process and Procedure, Standards of Accreditation*, by applying for initial or 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*. Accordingly, a school must supply the Commission with complete documentation of the school’s compliance with all accrediting standards and requirements if the school is to be granted renewal of accreditation (*Preamble, Introduction; Section I (D)( & (E), Rules of Process and Procedures; Standards of Accreditation*).

Given that the Commission found that the school’s response failed to demonstrate compliance with accrediting standards in 24 out of the 25 areas identified in the OER and did not satisfactorily address the additional information required, the Commission directs UCHB to submit a response which demonstrates, with supporting documentation, the school’s compliance with all referenced accreditation standards. In

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<sup>1</sup> ██████████ was the Director at the time of the evaluation; however, ACCSC records indicate that ██████████ is the current Director (see *Item #26*).

addition, this Warning letter provides a response framework that the school must follow in order to demonstrate compliance with accrediting standards. ACCSC strongly encourages UCHB to review the **Blueprints for Success**– [Organizing an Effective Electronic Submission](#), [Preparing a Comprehensive Response for Commission Consideration](#), and [The Graduation and Employment Chart](#) – when formulating and preparing its response to this Warning letter which will help to provide a framework for submitting a well-documented, organized, electronic response for Commission consideration.

UCHB is reminded that 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 on any applications, reports, forms or in any response to the Commission. The Commission noted that in the school’s response included student social security numbers were visible on the Enrollment Agreement forms. The school is strongly advised to utilize a student identification numbering system on transcripts, enrollment agreements, and other school documents that does not use the student’s social security number.

**Commission Findings:**

1. UCHB must demonstrate compliance with accrediting standards regarding management and administrative capacity as follows:
  - The school must demonstrate that it has adequate management and administrative capacity in place 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)(a), Substantive Standards, Standards of Accreditation*). The September 5, 2022 OER notes that the evaluation team had concerns with the school’s ability to lead and manage a post-secondary educational institution in compliance with accrediting standards based upon the included areas within the team findings.
  - The school must demonstrate that members of school management and administrative employees are qualified for their particular roles and possess the appropriate education, training, and experience commensurate with the level of their responsibilities (*Section I (A)(a), Substantive Standards, Standards of Accreditation*). The evaluation team noted that [REDACTED] is responsible for managing compliance, inventory, student services, career services, and the learning resource system, however, there was no documented training in any of these areas [REDACTED].

In response to the September 5, 2022 OER, UCHB stated that “[REDACTED] is the Full-Time on-site supervisor at the school” (October 12, 2022 UCHB Response, p. 9). In addition to providing [REDACTED] major responsibilities including policies and procedures, budget, assessment and goal setting, ongoing training activities, managing educational programs, tracking student achievement, organizing the Program Advisory Committee, and coordinating apprenticeships/externships, the school stated the following:

*We understand that it is not generally a good practice to combine Administrative and Instructor duties at as high of a level as [REDACTED] holds. As soon as the student census reaches 30 students, she will be replacing herself as an Aesthetician Instructor, and hold only her role as Director. During the Pandemic (2020 - 2022) UCHB has not enrolled any students for the Massage Therapy, Pharmacy Technician, and Full- Cosmetologist Programs. Since 2022 we have open enrollment for only three programs including Aesthetician, Nail Technician and Hairstyling Programs.*

With [REDACTED], the administrative staff of United College of Health and Beauty believes they have gained a sufficient number of managers and administrative employees necessary to support the school's operations.

With the addition of a dedicated assistant to [REDACTED] the UCHB administrative staff to student ratio is 1:3.

With that in mind, [REDACTED] aware that she, and UCHB's currently small administrative staff, is only able to carry the weight of the current duties due to the, currently, small student census. UCHB is aware that more managerial resources will need to be added as the school grows and enrollment increases. (*Id.*, p. 10).

Although UCHB's response asserts that the school has "gained a sufficient number of managers and administrative employees necessary to support the school's operations," the Commission noted that it appears as though the school already had the current management in place with [REDACTED] [REDACTED] having served as co-owners and hiring [REDACTED] in February 2019 prior to gaining initial accreditation in May 2019.

In addition, although the response states that "[w]ith the inclusion of [REDACTED] the scope of responsibilities for [REDACTED] has been streamlined; lightening her workload and allowing for the further delegation of administrative duties" (*Id.*, p. 11) along with supplying a list of [REDACTED] [REDACTED] duties, the Commission questioned the distribution of duties as the list primarily includes marketing, preparing reports, and Program Advisory Committees. Therefore, the Commission disagrees that the "currently small administrative staff is only able to carry the weight of the current duties due to the currently small student census" as demonstrated by the number of remaining concerns included herein this letter.

Additionally, the response does not indicate who is responsible for managing compliance, inventory, student services, career services, and the learning resource system. Given the number of unresolved concerns as listed herein this letter, the Commission is concerned that the school's plan for additional support is contingent upon reaching a population of 30 students, far exceeding the current population of seven students before additional support is added to assist with maintaining ongoing compliance with the *Standards of Accreditation*.

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

- a. A detailed narrative justification of the school's ability to lead and manage a post-secondary educational institutional in compliance with accrediting standards;
- b. A detailed narrative as to how the school demonstrates that administrative employees are qualified for their particular roles and possess the appropriate education, training, and experience commensurate with the level of their responsibilities;
- c. An organization chart showing all personnel responsible for the administration of the school;
- d. Formal job descriptions for all roles responsible for the administration of the school;
- e. A Staff Personnel Report for each person responsible for the administration of the school;
- f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

2. UCHB must demonstrate that the school has 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*). The school indicated verbally to the evaluation team that UCHB has written policies and procedures; however, no documentation of said policies and procedures were provided to the team during the evaluation.

In response, UCHB provided the Instructor Handbook. The Commission reminds the school that the operational policies and procedures should address all functional areas within the school. Of note, many of the concerns listed in this Warning letter refer to policies and procedures which, given the severity of the Commission's concerns around the school's operations, should be compiled into a single document.

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

- a. A complete and thorough set of policies and procedures for each major area of the standards (e.g., management, educational administration, recruitment admissions, student services, etc.) with a Table of Contents that also minimally includes, established practices for each of the individual areas cited in this Warning;
  - b. Information on how the school reviews and updates policies and procedures as needed;
  - c. The school's catalog fully cross-reference to the ACCSC Catalog Checklist;
  - d. The school's enrollment agreement fully cross referenced to the Enrollment Agreement Checklist;
  - e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
3. UCHB must demonstrate that at least one on-site person has appropriate educational administration experience and competence necessary to lead and manage the school's instructional programs and overall educational experience in such areas as: curriculum development; educational effectiveness assessment and improvement; and faculty development and performance appraisals (*Section III (A)(1)(b), Substantive Standards, Standards of Accreditation*). Through interview and observations, the evaluation team determined that while [REDACTED] is listed as the Academic Dean in the information provided to the team including the organizational chart, this is primarily due to [REDACTED] education background and credential. However, in practice, [REDACTED], is responsible for the management of the academic programs offered at the school. While [REDACTED] has 19 years of experience in the cosmetology field prior to the opening of the UCHB in 2010, there is no evidence to support engagements in curriculum development; educational assessment and improvement; or faculty development necessary to manage the school's instructional programs.

In response, the school stated:

*UCHB demonstrates that [REDACTED] has been a part of numerous classes, webinars, and seminars that have included training in curriculum development, educational assessment and improvement, and faculty development (Id., p. 12).*

In addition, UCHB provided a copy of [REDACTED] resumé, Staff Personnel Report, and Certifications. The Commission found that the documentation provided did not demonstrate that [REDACTED] engages in educational assessment and improvement or faculty development. In addition, the Commission remains concerned that according to the Staff Personnel Report submitted, [REDACTED] serves as the Lead Aesthetician for Exquisite Salon and Spa, the Director for United College of Health and Beauty,

and co-owner for both Exquisite Salon and Spa and United College of Health and Beauty along with leading and managing the school's instructional programs.

Based on the foregoing, the Commission directs UCHB to provide the following:

- a. A detailed description with supporting documentation demonstrating that the person overseeing the instructional programs has experience in such areas as: educational effectiveness assessment and improvement; and faculty development and performance appraisals;
  - b. A detailed description of any changes made to the educational administration since the submission of the response to on-site evaluation report; and
  - c. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
4. UCHB must demonstrate that the school provided the information in the Graduation and Employment Chart in accordance with the prescribed requirements and instructions that accompany this chart (*Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation*). The on-site evaluation team was unable to verify the graduation and employment rates submitted in the 2021 Annual Report because the supporting information and back-up documentation was incomplete to justify the classifications used by the institution. Specifically, the evaluation team noted that the school counted two students, one in the Hairstylist (Certificate) program and one in the Nail Technician (Certificate) program, as "Unavailable for Graduation" and one student in the Aesthetician (Certificate) program as "Unavailable for Employment" without proper documentation.

In response to the September 5, 2022 OER, UCHB stated that the discrepancy in the Graduation and Employment Charts reviewed by the team were the result of a mistake while inputting data for the 2021 Annual Report. The school provided revised Graduation and Employment Charts for the 2021 Annual Report for the following three programs: Aesthetician (Certificate), Nail Technician (Certificate), and Hairstylist (Certificate). In reviewing the documentation, the Commission noted that the three ACCSC Graduation and Employment Charts were not submitted in accordance with the *ACCSC Instructions for Electronic Submission*. Specifically, although the response indicates that the Graduation and Employment Charts are for the 2021 Annual Report, the report does not include the full Graduation and Employment Chart for each program as the Report Date, Program Length in Months, Ending Date of the 12-month Reporting Period, and cumulative rates are cut off and are not part of the response.

Due to the errors in compiling the documents, UCHB has yet to show that the school in fact corrected the discrepancies the team cited in the on-site evaluation report. UCHB also has yet to provide a description as to how the school planned to ensure that it will accurately submit data in the ACCSC Annual Report on an ongoing basis (e.g., through the establishment of a sound process and procedure). Thus far, the school has not provided Graduation and Employment rates for the 2021 Annual Report that the Commission can rely upon for making a decision regarding the school's Application for Accreditation.

Accordingly, the Commission directs UCHB to submit the following:

- a. Graduation and Employment Charts using a July 2021 Report Date for all programs offered at the school.
- b. A description regarding the action taken by the school to address the concerns listed above;

- c. A copy of the school’s updated policy and procedure to ensure the school will submit accurate reports in the future and is following the *ACCSC Instructions for Electronic Submission*; and
  - d. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
5. UCHB reported an employment rate that does not meet ACCSC’s minimum benchmarks, as outlined below (*Section VII (B)(1)(b), Appendix VI, Substantive Standards, Standards of Accreditation*). In response to the September 5, 2022 On-Site Evaluation Report, the school reported the following student achievement rates using a July 2022 Report Date:

Program (Credential)	Length in Months	UCHB Graduation Rate	ACCSC Benchmark Graduation Rate	UCHB Employment Rate	ACCSC Benchmark Employment Rate
Aesthetician (Certificate)	8	100%	60%	67%	70%
Hairstylist (Certificate)	12	100%	55%	100%	
Nail Technician (Certificate)	8	67%	60%	100%	

UCHB did not provide an analysis of the low employment rate or a description of the school’s plans going forward to improve in this area as a means to achieve the 70% employment benchmark rate.

In addition, although the school reported a graduation rate in the Aesthetician (Certificate) program that exceeds ACCSC’s benchmark rate, the Commission questioned the accuracy of that graduation rate (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). Specifically, the school classified two students on the Aesthetician (Certificate) program Graduation and Employment Chart as “Unavailable for Graduation” due to medical reasons; however, the school only submitted a statement from the school Director to support these classifications and did not provide any verifiable documentation such as a letter from a physician. This documentation does not meet the classification definition as listed in the *Glossary of Terms Used on the ACCSC Graduation and Employment Chart*.

Based on the foregoing, and in conjunction with the Commission’s concerns cited in #4 above, the Commission directs the school to submit the following:

- a. A Graduation and Employment Chart for all programs offered at the school using **January 2023 Report Date**.
- b. Summary information for the Graduation and Employment Chart 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	Aesthetician	01/10/17	06/01/2018	N/A
2	12346	Aesthetician	01/10/17	N/A	01/10/2018

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

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

- iii. Supporting and verifiable documentation for each student in (ii.) above to include minimally, external documentation such as military orders, letter from physician/doctor, death notice/obituary, public record of incarceration.

- iv. For each graduate classified as employed in the field<sup>2</sup> (line #14), provide the following information:

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

- v. Supporting and verifiable records of initial employment that include all items required by *Appendix VII, Standards of Accreditation*.
- vi. From the list in (iv.) 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				

- vii. Supporting and verifiable written documentation for each graduate in (vi.) above to include a signed statement from the graduate with the graduate’s name and contact information; an attestation that the self-employment is aligned with the individual’s employment goals, is vocational, is based on and related to the education and training received; an attestation that the graduate is earning training-related income; and in cases where licensure is required for employment, an attestation that such licensure has been achieved.

- viii. From the list in (iv.) 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				

- ix. Supporting and verifiable documentation for each graduate in (viii.) above to include written documentation from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided 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.

- x. 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						

- xi. Supporting and verifiable documentation for any graduate classified in (x) to include, minimally, external documentation such as transcripts/enrollment agreements for “Graduates-Further Education” and military orders, letter from physician/doctor, death notice/obituary, public record of incarceration, etc. for “Graduates-Unavailable for Employment.”

- d. An analysis and update on the impact of the pandemic on student achievement, if applicable.
- e. If the student achievement rates in the provided Graduation and Employment Charts for any of the programs offered by the school fall below the ACCSC benchmarks, an evaluation of the factors

<sup>2</sup> See *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*.

<sup>3</sup> *Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation* requires the school to verify the employment classification.

impacting student achievement and a description of the school's efforts overcome those factors along with an analysis of the school's efforts to overcome these factors; and

- f. 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.
6. UCHB must demonstrate that the school supports reported student achievement rates through verifiable records of each graduate's initial employment (*Section VII (B)(1)(b)* and *Appendix VII, Substantive Standards, Standards of Accreditation*). Specifically, the evaluation team found that the school does not have internal employment verification policies and procedures to be able to verify graduate's initial employment.

In response to the OER, the school provided a list of the 10 most recent graduates that gained employment in the career field for which the school provided education and noted that eight of the graduates are self-employed. In reviewing the backup documentation, the Commission found numerous discrepancies and instances of incomplete documentation. For instance, UCHB provided a list of 10 students, two of which were classified as regular employment while the supporting documentation shows three graduates with regular employment and four self-employed graduates (along with a statement of a student's continuing education status). Additionally, the school provided employment verification documentation that does not show all necessary components to complete the verification process through varying forms, communication with students, and verifiable records. Likewise, the school provided inconsistent self-employment verification forms. Specifically, the Commission noted the form used for several graduates is titled Graduate Self-Employment Verification; however, the documentation appears to consist of the graduate's attestation of general employment rather than "self-employment."

Accordingly, the Commission directs UCHB to submit the following;

- a. The school's policies and procedures related to initial employment verification to include career advancement;
- b. A copy of the school's current verification form or other tool the school is currently using to verify employment;
- c. A list of the 10 most recent graduates who gained employment in the career field for which the school provided education using the following chart:



Count	Student ID#	Program	Start Date	Grad. Date	Employer, Contact, Address & Phone #	Date of Initial Employ.	Descriptive Job Title
1	123456	Hairstylist	1/10/2020	1/10/2021	Salon Spa, Jane Smith 123 Sample Way, Anywhere, MD 222.333.1234	2/1/2022	HVAC Technician
2	123457	Hairstylist	1/10/2020	1/10/2021	Hair Design, Joan Jones 456 Maple Dr. Somewhere, VA 333.444.5678	3/1/2022	HVAC Technician

- d. The following supplementary information for each graduate identified in the chart above:
- i. A copy of the school’s completed verification form for each graduate employed;
  - ii. For each graduate classified as self- employed, provide a signed statement from the graduate verifying that the employment is valid which includes:
    - 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;
    - An attestation that the graduate is earning training-related income; and
    - In cases where licensure is required for employment, an attestation that such licensure has been achieved; and
  - iii. For each graduate classified as “career advancement,” provide 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; and
- e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with ACCSC’s requirements.
7. UCHB must demonstrate that the school is attentive to its students’ education and other needs as a means to support retention, maintains written policies and procedures addressing student services, and makes students aware of such services (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). Results from the student survey conducted during the evaluation indicate the following:
- 29% dissatisfaction with regard to student services;
  - 29% dissatisfaction with regard to financial aid;
  - 25% dissatisfaction with the library/learning resource system;
  - 25% do not feel good about their decision to attend the institution; and
  - 25% would not recommend the school to a friend.

In response to the OER, UCHB provided new student surveys and noted that the school is only approved for Federal Financial Aid for the Aesthetician Program and that this fact affected student responses. In reviewing the documentation, the Commission took that note into account but found that the surveys provided were administered at different times across three years and that the school did not provide details about the survey sampling or population. Additionally, the school provided no other analysis as to the on-site survey results other than commenting on the federal financial aid status despite the range of issues identified by the on-site evaluation surveys. Overall, the Commission is simply interested in

obtaining contemporaneous information about student satisfaction with the school, its training, and its resources.

Accordingly, the Commission directs UCHB to submit the following:

- a. A description of the school’s mechanisms for obtaining student feedback consistently and being attentive to student needs based on that feedback;
  - b. A survey conducted in 2023 of all enrolled students using the attached ACCSC survey tool;
  - c. A detailed analysis of any area where students express a below 80% level of satisfaction along with an assessment of the factors impacting that/those area(s);
  - d. An explanation as to how the strategies implemented by the school are intended to target those any identified factors; and
  - e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards
8. UCHB must demonstrate that the school engages in significant and ongoing institutional assessment and improvement activities appropriate to the size and scale of the school’s operations and that support the management and administration of the school as well as the quality of education provided (*Section I(B)(1), Substantive Standards, Standards of Accreditation*). The evaluation team noted that while the school provided what appeared to be an older planning document that describes future goals, the documentation provided did not demonstrate that the school continuously engages in planning and improvement activities to help support the school’s operations as needed and did not provide documentation of completed activities.

In response to the team’s finding, the school did not provide a narrative response but did provide goal setting and improvement plans from 2019-2023. In reviewing the submitted plans, the Commission noted that the given objectives covered business, compliance, and regulatory matters such as the addition of new programs, compliance with ACCSC standards, monitoring COVID, federal student aid approval, and state renewal but not institutional assessment and improvement activities. The Commission found that the given objectives are items that are required for UCHB’s continued operation and not supportive of analyzing and improving the quality of education at the school.

Accordingly, the Commission directs the school’s attention to the ACCSC Monograph on [Institutional Assessment and Improvement Planning/Implementation](#) and directs UCHB to submit the following:

- a. A description of the school’s recent and contemporaneous institutional assessment and improvement activities to include, as applicable, an updated Goal Setting and Improvement Plan;
  - b. Documentation of any institutional assessment and improvement activities noted in item (a.) above to include meeting minutes, presentations, attendance, etc.; and
  - c. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
9. UCHB school must demonstrate compliance with Program Advisory Committee (“PAC”) standards, as follows:
- The school must demonstrate it has an independent and diverse Program Advisory Committee for each program area to review the established curricula of the program/program area, instructional-

related program materials, equipment and facilities, and student achievement outcomes as a means to provide the school with an external review of its programs (*Section II (A)(4)(b)(i), Substantive Standards, Standards of Accreditation*). PAC meeting minutes provided to the evaluation team were not detailed and did not show a meaningful review of programs.

- The school must provide evidence that the school gives consideration to PAC input (*Section II (A)(4)(c), Substantive Standards, Standards of Accreditation*).

The On-Site Evaluation Team noted that the provided PAC meeting minutes were not detailed and did not show a meaningful review of programs.

In response, the school provided a copy of PAC meeting minutes from May 4, 2022. The Commission noted that the submitted minutes do not appear to cover all required areas such as instructional-related program materials, equipment and facilities, and student achievement outcomes. The minutes do state that another meeting would be held in 2022 with the date yet to be announced.

Accordingly, the Commission directs UCHB to submit the following:

- a. Written and detailed minutes of all PAC meetings held in 2022 and 2023 that include:
    - A description of all members in attendance (i.e., titles and affiliations);
    - An annotation as to which PAC members represent the employment community, and which are qualified to review delivery of distance education;
    - The date, time, and location of the meeting(s); and
    - A comprehensive and clear description of the review of and commentary made by PAC members in compliance with *Appendix III, Substantive Standards, Standards of Accreditation* (the school is reminded that PAC review and comment activities must include all items outlined in *Appendix III, Substantive Standards, Standards of Accreditation*); and
    - Evidence to show that the school gives consideration to the recommendations of the PAC;
  - b. A schedule for any future Program Advisory Committee meetings; and
  - c. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
10. UCHB must demonstrate compliance with accrediting standards with regard to the learning resource system ("LRS"), as follows:
- The school must demonstrate that the LRS includes materials commensurate with the level of education provided and appropriate to the courses of study in sufficient quantity and scope to meet the educational objectives of each program (*Section II (A)(6)(a), Substantive Standards, Standards of Accreditation*). The evaluation team, in conjunction with the Occupation Specialist, noted that the school does not have materials that adequately support the programs currently being offered at the institution.
  - The school must demonstrate that the LRS is managed by qualified personnel with sufficient experience to provide oversight and supervision (*Section II (A)(6)(d), Substantive Standards, Standards of Accreditation*). The evaluation team noted that while [REDACTED] is responsible for managing the learning resource system, [REDACTED] does not appear qualified with sufficient experience to provide oversight and supervision of the LRS.

- The school 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)(6)(e), Substantive Standards, Standards of Accreditation*). The team noted that when a student wishes to check out an item from the school’s physical holdings, their respective instructor facilitates the lending process; however, it was unclear how faculty are oriented and trained on the LRS.
- The school must have written policies and procedures for the ongoing development of its learning resource system as part of its institutional improvement program (*Section II (A)(6)(f), Substantive Standards, Standards of Accreditation*).

In response, the school stated that “[REDACTED] is capable of providing effective oversight and supervision of the LRS in several ways” (*Id.*, pgs. 22-23). In addition, UCHB noted that each faculty member is charged with orienting and supervising students’ use of the LRS with overall oversight by [REDACTED] who trained each faculty member on the LRS after the On-Site Evaluation. UCHB additionally noted that formal and informal surveys of students showed student satisfaction with the LRS and student’s orientation to the LRS along with providing a copy of the student handbook and program completion requirements.

In reviewing the submitted material, the Commission noted that there is no documentation regarding the implementation of the faculty or student LRS orientation or any policies and procedures regarding ongoing LRS development. In addition, the Commission found that while the student handbook references student orientation to the LRS, the handbook does not describe when or how the orientation takes place or what the orientation includes. Additionally, the Commission noted that [REDACTED] resumé does not appear to contain training or education specific to LRS and that delegation of the LRS to faculty would require training or education for all faculty though UCHB’s response did not appear to document any such training or education.

Accordingly, the Commission directs UCHB to submit the following:

- a. A description of the LRS faculty orientation conducted by [REDACTED] and any available documentation of the orientation;
  - b. A description of the LRS student orientation and any available documentation of the orientation;
  - c. Description and documentation of [REDACTED] qualifications for oversight of the LRS;
  - d. Description and documentation of faculty qualifications for the LRS;
  - e. The school’s policy and procedure for ongoing development of the LRS; and
  - f. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
11. UCHB must demonstrate that members of school management and administrative employees participate in ongoing development and training activities that support their particular roles in the school (*Section I (A)(3), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the school provided documentation for a 2015 leadership development activity for [REDACTED]; however, the school did not demonstrate that management and administrative employees have participated in ongoing professional development activities since 2015.

In response, UCHB did not provide any narrative response but did reference the exhibits for [REDACTED] Staff Personnel Report and Certifications along with [REDACTED] Staff Personnel Report and Certifications. In reviewing [REDACTED] Staff Personnel Report, the Commission noted the following ongoing development and training activities:

Institution, Program, Professional Organization, etc. – City, State	From Mo/Yr	To Mo/Yr	Description and Nature of Training/Education/Membership	Copy on File-Y/N
ACCSC – Virtual	9/21/2020	9/23/2020	Professional Development Conference	Y
ACCSC – Virtual	7/29/2021	7/30/2021	Accreditation Renewal Workshop	Y
Masterclass Management.com	9/12/2022	9/12/2022	Master Certificate in Business Management	Y
Federal Student Aid	11/19/2021	11/19/2021	2021-22 Fundamentals of Federal Student Aid Administration	Y

In addition, the Commission noted the ongoing development and training activities for [REDACTED] consisted of attending the July 2021 Virtual Accreditation Renewal Workshop, the September 2020 Virtual Professional Development Conference, and the November 2021 Fundamental of Federal Student Aid Administration workshop.

The Commission found that neither Staff Personnel Report reflect any activities completed during 2019 when the school achieved initial accreditation. Additionally, the training and development activities do not clearly include all areas of responsibility as stated by UCHB. Moreover, the activities for each area of responsibility should be completed on an annual basis and not singularly during the grant of accreditation.

Based on the foregoing, the school is directed to submit the following:

- a. The school’s policies and procedures for ongoing development and training activities;
- b. Supporting documentation of implementation of development and training activities for school management and administrative employees per the school’s policies and procedures;
- c. The school’s plan to ensure compliance on an ongoing basis; and
- d. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.

12. UCHB must demonstrate that its faculty and educational administrators engage in ongoing faculty assessment and professional development activities that are appropriate to the size and scope of the school’s educational programs; support the quality of education provided; and enhance student learning and achievement (*Section III (A)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that faculty files included copies of faculty credentials, faculty contracts, and evidence of professional registration with state regulators. However, documentation of professional development activities was not available.

In response, UCHB did not provide any narrative response but did reference the exhibits for [REDACTED] Resumé and Faculty Personnel Report and Certifications along with Faculty Personnel Reports for [REDACTED] and [REDACTED]. In reviewing [REDACTED] Faculty Personnel Report, the Commission found several hand-written development opportunities, primarily from MiLady, that were completed in 2021 and 2022; however, the school provided no documentation to support these

activities. In addition, the school listed no activities for 2019 and only included an Infection Control Certificate for 2020. The Commission reminds UCHB that the Faculty Personnel Report must be typed.

In addition, in reviewing the Faculty Personnel Reports for [REDACTED], the Commission found that although both instructors were hired in 2016, neither had any professional development in 2019 or 2020 and [REDACTED] did not have any activities in 2021. Additionally, the school did not provide any documentation supporting the listed professional development activities.

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

- a. The school’s policies and procedures for ensuring that all faculty participate in ongoing training, professional development, and assessment activities;
- b. A list of all faculty;
- c. Documentation demonstrating that the faculty have participated in professional development appropriate for their respective subject areas; and
- d. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.

13. UCHB must demonstrate compliance with recruitment and admissions standards as follows:

- The school must demonstrate that it does not permit personnel whose primary responsibilities include recruiting and admissions activities to become involved in admission testing or admission decisions, including signing and accepting the enrollment agreement (*Section IV (A)(13), Substantive Standards, Standards of Accreditation*). The evaluation team found that [REDACTED], who serves as the school director, actively recruits students and serves as the primary staff responsible for signing and accepting enrollment agreements.
- The school must demonstrate that prior to enrollment the school secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(b), Substantive Standards, Standards of Accreditation*). In the review of 22 student files, the evaluation team noted the following:
  - 14 files were missing proof of an interview;
  - 5 files were missing a high school credential or post-secondary education credits;
  - 16 files were missing the required social security card; and
  - 2 files were missing proof of age or government ID.

In response, UCHB did not provide any narrative information. The school submitted Sample Enrollment Agreements from 2019 to 2021 signed by [REDACTED] and the admissions policy along with enrollment agreements and documentation for the 10 most recently enrolled students. In reviewing the enrollment agreements and the backup documentation, the Commission noted the following:

Student Name	Program	Start Date	Estimated Completion Date	Notes
[REDACTED]	Aesthetics	3/22/2022	10/2022	The program is listed as 7 months Orientation Checklist dated 3/24/2022 after the start date

Student Name	Program	Start Date	Estimated Completion Date	Notes
██████████	Nail Technician	3/2/2022	9/2/2022	The program is listed as 6 months
██████████	Esthetics	9/8/2022	Not Listed	The program name on the Enrollment Agreement is incorrect No Estimated Completion Date is listed Includes a higher level credential earned but no high school diploma or GED included
██████████	Aesthetician	8/17/2022	9/14/2022	Program listed as less than 1 month
██████████	Nail Technician	8/31/2022	Not Listed	The enrollment agreement does not indicate whether the student is full-time or part-time
██████████	Aesthetician	5/12/2022	9/2022	Program listed as 4 months The Application Checklist includes a Student Start Date of 5/2/2022
██████████	Hairstylist	9/1/2021	Not Listed	Includes documentation of a translated and evaluated higher level credential but no high school diploma or GED
██████████ ██████████	Nail Technician	9/1/2021	Not Listed	N/A
██████████	Nail Tech	9/1/2021	Not Listed	The program name on the Enrollment Agreement is incorrect The Orientation Checklist is not signed or dated by the UCHB Rep.
██████████	Nail Technician	9/1/2021	Not Listed	No Orientation Checklist included

Additionally, in reviewing the information provided by the school the Commission found the following:

- The admission process as listed in the catalog states that the “[a]pplicant must sign waiver verifying all immunizations are up to date and that they are responsible for the up keep of their personal health (Where applicable)” (*Id.*, p. 793), however, the school did not provide any documentation of this requirement or information as to when this requirement is applicable;
- The documentation includes a Certificate of Completion Infection Control for each student that is not included as part of the admission process and would not seem to be able to serve as a waiver verifying all immunizations;
- The admission process as listed in the catalog states that “[s]tudent must be able to speak, read, and write English fluently” (*Id.*), however, the school did not provide any documentation showing the implementation of this requirement;
- The enrollment agreement references the current catalog as the “Catalog Volume No. 3, Dated January 2013” for enrollment agreements signed in 2021 and 2022;
- The Application Checklist included as documentation for each recently enrolled student includes requirements not listed in the catalog including the “Request for two (2) References/Letters of Recommendation (if needed)” but does not provide any clarification on when these references/letters would be necessary;
- The Application Checklist includes a section titled "Interview and Evaluation of Applicant” which is not completed for any of the 10 recently enrolled students;

- The Application Checklist includes a section titled "Recommendation By Director of United College of Aesthetics" which is not completed for any of the 10 recently enrolled students and includes an reference to an incorrect school name; and
- Although the catalog and enrollment agreement state that a high school diploma or GED are part of the admission requirements, UCHB accepted higher level credentials in lieu of this requirement without any allowance in the school’s admission policy.

In addition, the Commission found that the enrollment agreement references the Books/Supplies/Equipment as non-refundable and also states that students who cancel within three business days are entitled to a full refund of tuition and fees paid without reference to books/supplies/equipment. The Commission reminds UCHB that *Section I (D)(2)(b), Substantive Standards, Standards of Accreditation* states that an applicant requesting cancellation within three days after signing the enrollment agreement and making an initial payment is entitled to a refund of all monies paid by the applicant and that the school should update the enrollment agreement to reflect this requirement.

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

- A copy of the school’s admissions policies and procedures;
- The school’s admissions requirements and procedures as published in the catalog;
- An explanation for how the school ensures that students who cancel within three business days are entitled to a full refund of tuition and fees paid;
- A narrative for how the school ensures that that prior to enrollment it secures documentation to demonstrate that each applicant meets all admission requirements;
- A list of the 10 most-recently enrolled students enrolled since the submission of the response to the evaluation to include the following information:

Student ID#	Program	Start Date	Date Admission Documentation Received	Date Enrollment Agreement Signed by Student	Date Enrollment Agreement Signed by Accepting School Official	Name of the Accepting School Official

- A copy of the executed enrollment agreement and admissions documentation for each student included in (e.) above; and
- 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.

14. UCHB must demonstrate that the school has established a policy and process to assess student academic progress throughout the program and to inform students of their academic progress at established and specific intervals (*Section VII (A)(3)(a), Substantive Standards, Standards of Accreditation*). Specifically, although the school was able to provide the evaluation team with the student satisfactory progress policy, the team was unable to verify the policy as the school was unable to provide documentation of implementation of the satisfactory progress policy.

In response, UCHB noted that the school revised the satisfactory academic progress policy and provided a copy of the policy and sample progress reports. In reviewing the submitted documents, the



Commission noted that the sample progress reports lack student identifiers and do not show that students received the reports and as such do not document that the school has implemented the policy.

Accordingly, the Commission directs UCHB to submit the following:

- a. A copy of the school's Satisfactory Academic Progress policy, as published in the catalog;
- b. Documentation to demonstrate that the school informs students of their academic progress at established and specific intervals as included in the school's published policy;
- c. A copy of the five most recent progress reports issued to students;
- d. A description as to how UCHB provides the progress reports to students; and
- e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

15. UCHB must demonstrate compliance with accrediting standards related to attendance as follows:

- The school must demonstrate that for every program, there is a scope and sequence of subject matter sufficient to achieve the program objectives and to acquire the necessary knowledge, skills, and competencies (*Section II (A)(3)(a), Substantive Standards, Standards of Accreditation*).
- The school must demonstrate that UCHB enforces the stated attendance policy (*Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation*).

The evaluation team found that students in the Hairstylist and Nail Technician programs may only attend class when the instructor is available, however, the availability varies. This was evident in the cancellation of the evening classes during the visit. As such, there is no set schedule or official start dates, meaning the institution cannot demonstrate a scope and sequence sufficient to achieve the program objectives or enforce the published attendance policy.

In response, the school provided program syllabi and completion requirements for the Aesthetician, Nail Technician, and Hairstyling programs as well as the school's attendance policy and attendance records from the Hairstylist and Nail Technician programs. The Commission found that the submitted documentation does not represent the necessary scope, sequence, and attendance. Specifically, program syllabi do not provide detailed week-by-week breakdowns of course descriptions as the noted content jumps between weeks. For example, the Aesthetician program syllabi notes weeks 1, 2, 5, 12, and 30. Attendance documentation, however, shows each week (1, 2, 3, 4, 5, and so on) and records completed tasks in handwritten notes. Accordingly, this documentation does not demonstrate a clear program scope and sequence. Additionally, the Commission noted that some time records appeared to show excessive daily hours logged with students earning 20, 22, 23, and 26 hours logged in a single day without clear source or rationale of the hours.

Accordingly, the Commission directs UCHB to submit the following:

- a. For each program, a week-by-week breakdown of hours as noted in the provided syllabi;
- b. A detailed narrative explanation for the high number of daily hours rewarded;
- c. Any policies and procedures related to item (b.) above;
- d. An updated explanation for how the school ensures there is a scope and sequence of subject matter sufficient to achieve the program objectives and to acquire the necessary knowledge, skills, and competencies;

- e. The current courses scheduled for the Hairstylist and Nail Technician programs to include instructor name, class schedule, term start date, and term end date;
- f. Attendance records for the five most recent students in the Hairstylist and Nail Technician programs; and
- g. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

16. UCHB must demonstrate compliance with accrediting standards relative to the budget in the following areas:

- The school must demonstrate that it prepares a financial budget for each fiscal year that allocates working capital for expenditures required to ensure the proper operation of the school (*Section V (C)(2), Substantive Standards, Standards of Accreditation*).
- The school must demonstrate sufficient support and budgetary allocations for the learning resource system (*Section II (A)(7)(f), Substantive Standards, Standards of Accreditation*).

The evaluation team was unable to verify financial stability or funds allocated to the learning resource system, as no budget was provided by the institution.

In response, the school provided its 2022 Budget vs. September 2022 Actual. In reviewing the submitted budget to actual comparison, the Commission noted that the actual spend amounts appear to be rounded figures and that while the school budgeted \$15,000 to the Learning Resource System ("LRS"), the school has only spent \$1,500 which led the Commission to question the accuracy of the school's budget and the funding of the LRS.

Accordingly, the Commission directs UCHB to submit the following:

- a. Clarification regarding the apparent rounding of actual spend figures;
- b. An explanation regarding the discrepancy between the amount budgeted for LRS and the actual spend of LRS, to include a description of the \$1,500 spent on the LRS to date;
- c. An updated copy of the school current fiscal year budget with a budget-to-actual analysis as of March 2023; and
- d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

17. UCHB must demonstrate that tuition discounts are fully, clearly, and accurately disclosed to the prospective student before enrollment and fairly applied (*Section I (D)(1)(a)(i-ii), Substantive Standards, Standards of Accreditation*). In a review of five drop files, the evaluation team noted sporadically applied "discounts" for tuition. Interviews with the school director indicated that on occasion, the total tuition may be adjusted if requested by the student.

In response to the OER, the school stated that 50% discounts are given to students completing stand-alone courses if the student has completed a full program. Additionally, the school noted that scholarships may be offered to students at the judgement of the school Director. UCHB also provided a sample enrollment agreement with discounts and a statement regarding a tuition discount. In reviewing the submitted information, the Commission noted the use of a scholarship but did not see documentation of specified criteria or a disclosure that the scholarship is available.

Accordingly, the Commission directs UCHB to submit the following:

- a. The scholarship and tuition discount opportunities available to students as published to students;
  - b. A description of the scholarship, including the qualifying criteria;
  - c. A list of the 10 most recent students to apply for and be awarded scholarship funds or tuition discounts;
  - d. The documentation the school relied upon to award the scholarship or discount the tuition;
  - e. Ledger cards of these students identified above showing the scholarship funds applied; and
  - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
18. UCHB must demonstrate that school measures grades, projects, or other assessments against stated educational objectives that the school explains clearly to students and that the school's policy addresses performance standards and grading and is applied consistently. (*Section VII (A)(2)(d), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that although the school provides student learning outcomes in the syllabi and catalog, the school does not utilize a policy that addresses performance standards and grading that is applied for the consistent evaluation of student work across all students and faculty. Specifically, the school indicated that the curriculum and outcomes are adjusted for each student.

In UCHB's response, the school submitted program objectives, sanitation and sterilization quizzes, and a student quiz on Colorado laws, rules, and regulations. The Commission noted that the lack of a narrative in conjunction with the ad hoc appearance of program scope and sequence failed to show or provide documentation of the school's use of consistent grading, projects, or other assessments.

Accordingly, the Commission directs UCHB to submit the following:

- a. A detailed narrative description as to how the school ensures consistent student assessment;
  - b. Any policies and procedures related to the school's narrative in item (a.) above;
  - c. Evidence of the utilization of such metrics or assessments for multiple students completing the same projects or other assessments; and
  - d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
19. UCHB must demonstrate that the school has a written emergency preparedness plan that includes scenario identification, lockdown procedures, communication procedures, orientation to students, and training for staff and faculty (*Section I (G)(3)(b-c), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that while the school does have evacuation maps placed throughout the school, there is no written emergency preparedness plan.

In the school's response, UCHB noted that the school had updated written emergency preparedness plans for both facilities and was training faculty, staff, and students on the plans. Additionally, the school provided its emergency preparedness plans. However, the Commission noted that the school did not provide documentation as to how UCHB has oriented students to the plan, implemented training on the plan, and distributed the plan.

Accordingly, the Commission directs UCHB to submit the following:

- a. A detailed narrative explanation as to how the emergency preparedness plans were distributed;
  - b. A detailed narrative description of orientation and training on the emergency preparedness plans;
  - c. Any available documentation of the emergency preparedness plans training, distribution, and orientation; and
  - d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
20. UCHB must demonstrate that the school describes itself consistently with regard to programs (*Section I (D)(2), Rules of Process and Procedure, Standards of Accreditation*). The on-site evaluation team found multiple discrepancies in hours and program length in reviewing various documentation. Specifically, the course syllabi indicate that the Aesthetician and Nail Technician programs are 640-hour programs, and Hairstyling is a 1240-hour program. However, ACCSC program approvals and program outlines state that the Aesthetician and Nail Technician programs are approved at 600 hours while the Hairstyling program is approved at 1200 hours.

In UCHB's response, the school noted that the discrepancy in program hours and length was due to the failure to update the various documentation identifying the program information after a program modification. Despite the school's acknowledgement of the error and revised documentation demonstrating the changes, the Commission found that the school failed to ensure all the program information is consistently described. Specifically, the Aesthetician Syllabus on page 593 of the school's response displays a chart of the "32-Week Course" with a breakdown of contact hours per unit; however, the contact hours noted in the chart do not equal the 600-clock hour program length as demonstrated in the chart and at the top of the syllabus.

Accordingly, the Commission directs UCHB to submit the following:

- a. A detailed explanation outlining the reason for the discrepancy noted and any applicable information demonstrating compliance with accrediting standards;
  - b. An Allocation of Hours for Clock Hour Programs for the Aesthetician program;
  - c. Revised syllabi for each course listed on the Aesthetician Allocation of Hours for Clock Hour Program form;
  - d. A copy of the school's policy and procedure for consistently describing the programs in school documentation; and
  - e. Any additional information that the school believe will assist the Commission in determining the school's compliance with accrediting standards.
21. UCHB must demonstrate that all advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*). Specifically, the institution uses the phrases "guaranteed understanding," "highest quality," and "most advanced training" in advertising and social media. Although the school updated the website during the on-site evaluation, the school was unable to demonstrate specific policies and procedures pertaining to advertising to prevent similar statements from being used in the future.

In response, the school stated the following:

*UCHB has removed/corrected any misleading statements or claims about the school from the website. UCHB has not done any advertising since the on-site evaluation but, all promotional materials or advertisements will not make misleading statements or claims, and will only reflect what is truthful and accurate about the school, its location, its name, its personnel, its training, its services, or its accredited status (Id., p. 28).*

However, UCHB did not provide any documentation demonstrating that the school removed/corrected any misleading statements or claims or any policies and procedures to ensure future promotional materials or advertisements will not make misleading statements or claims.

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

- a. Policies and procedures pertaining to advertising;
  - b. Documentation demonstrating that the school removed and/or replaced the aforementioned claims and phrases from all advertising and promotional materials to include the URL of the school's website, links to the school's social media platforms; and copies of current advertising materials to reflect any revisions made by the school;
  - c. Copies of website and advertising materials to reflect the revised phrases and claims; and
  - d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
22. UCHB must demonstrate that the school publishes a catalog that accurately portrays the school; its educational programs, policies and procedures; and that includes, at a minimum, all items listed on the ACCSC Catalog Checklist (*Section IV (C)(1)(a) Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that although students are provided a catalog, many of the policies and procedures published are not accurate to the school's actual practice to include the transfer policy and graduation requirements.

In response, the school stated:

*UCHB has updated the Admissions policy by removing the requirement for an interview with the Director and the requirement for students to provide their Social Security Card. The Admissions Process was also updated to remove the requirement of the background check through CBI, because UCHB no longer offers medical classes or massage therapy classes (Id., p. 28).*

In reviewing the updated catalog provided by the school, the Commission noted the following:

- Under Tuition Refund Policy, the catalog states "Students who cancel their Enrollment Agreement, by notifying the school within three (3) business days of its execution are entitled to a full refund, minus the \$50 registration fee" (*Id.*, p. 803); however, the *Standards of Accreditation* require that all monies paid are returned if a student cancels within three business days;
- Under Certification, State Board, National Exam, there is the statement "Beginning April 1, 2009, all graduates must apply for professional certification through PSI" (*Id.*, p. 806), but it is unclear if this is in addition to the state licensure requirements;

- While the Student Records Retention Policy references the items that a transcript will include, the policy does not include all of the ACCSC required items such as the student's name and unique identifier and the name and date/term of courses taken;
- Although the response states that [REDACTED] is responsible for academic oversight, the catalog lists [REDACTED] as the Dean;
- The catalog references contacting the Director of Education when it does not appear that this position exists within UCHB; and
- The catalog references credits earned when the school is only approved for clock hours.

As such, the Commission will review the school's most recent catalog, cross-referenced to the [ACCSC Catalog Checklist](#) (as requested in Item #2 above). If the school updated catalog policies based on updates to the school's operational policies and procedures, the school should provide a narrative describing the changes along with documentation of the updated policies.

23. UCHB must demonstrate that the school securely maintains and protects records (physical or electronic) against damage or loss (e.g., fire, water, theft, tampering, etc.) (*Section VI (B)(1), Substantive Standards, Standards of Accreditation*). Specifically, the on-site evaluation report noted that the evaluation team observed a fire-proof cabinet, and that the school indicated that files beyond the past 24 months are stored in other locations throughout the building.

In response, UCHB provided a description of the physical and electronic record protection that the school asserts it maintains; however, the response does not acknowledge the issue of records older than the past 24 months that are supposedly stored in other locations in the building. Additionally, while UCHB's response speaks to preserving hard copy records and digital records, the school did not provide the policies and procedures related to securing records such as which records are kept as hard copies and which are digital.

Accordingly, the Commission directs UCHB to submit the following:

- a. A copy of the school's record retention policy and procedure;
- b. A detailed explanation of the school's procedure for maintaining and protecting records that are beyond that last 24 months; and
- c. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

24. UCHB must demonstrate that the school maintains indefinitely a permanent official transcript for all current and formerly enrolled students that includes a cumulative GPA (*Section VI (B)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the school's official transcripts do not include a cumulative GPA. In response, the school provided transcripts that included the cumulative GPA for all students. However, upon further review, the Commission found that the transcripts appear to omit other required information, to include, the student's name and unique identifier along with the name and date/term of courses taken.

Accordingly, the Commission directs UCHB to submit the following:

- a. An explanation of any updates made to the school's transcript;
- b. A list of the 10 most recent graduates;

- c. Copies of the official transcripts for each graduate listed above; and
  - d. Any information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
25. UCHB must demonstrate that all facilities owned or controlled for administrative, instructional, and housing purposes meet fire, safety, and sanitation standards required by appropriate regulatory authorities (*Section I (G)(1), Substantive Standards, Standards of Accreditation*). While the institution did provide a "Department Violation Notice," stating there were no violations, the evaluation team found that all four fire extinguishers were expired, three of which expired in 2004, and one of which expired in 2020. In addition, the on-site evaluation team, with input from the Occupation Specialist, noted that the salon space in the satellite location did not appear to follow typical sanitary standards with no clear methods or policies used to ensure salon client safety.

In response, the school stated:

*United College of Health and Beauty has had all Fire Extinguishers in all facilities inspected and up-to-date. All students are required to complete an Infection Control Certification when enrolled. All technicians/instructors at the satellite location were required to go through the same certification after the school/salon re-opened after the COVID-19 shutdown (Id., p. 30).*

UCHB referenced that the submission included Update Fire Extinguishers and Infection Control Certifications, however, the information pertaining to the updated fire extinguishers was not included with the submission. In addition, the Commission noted the submitted Infection Control Certifications do not clearly indicate the methods or policies to ensure salon client safety.

Accordingly, the Commission directs UCHB to submit:

- a. A copy of a recent 2023 safety inspection of the facilities;
  - b. Documentation demonstrating that the current fire extinguishers are not expired;
  - c. Documentation to demonstrate how the school follows typical sanitary standards, to include policies to ensure salon client safety; and
  - d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
26. The September 5, 2022 OER notes that information submitted as part of the *Application for Renewal of Accreditation* identifies the current Campus Director as [REDACTED]. In addition, the on-site evaluation team noted the current director as [REDACTED]. However, this does not align with the information in the ACCSC College360 database that lists [REDACTED] as Campus Director. As such, the school is directed to review the accuracy of the school information and contacts listed in the ACCSC College360 database and, if applicable, submit a [Change of Director Contact Information](#) form.

In response, UCHB stated "Not Applicable" (*Id.*, p. 30). However, the Commission found that the school stated multiple times in the response to the September 5, 2022 OER that the current Director is [REDACTED]. As such, the Commission directs the school to submit the necessary Change of Director Contact Information form to identify [REDACTED] as the Director in the ACCSC College360 Database.

27. UCHB must demonstrate that it follows the process and procedure for new programs as outlined in the *Standards of Accreditation*; ACCSC Rules of Process and Procedure state that "if a school does not

enroll and start new students in a newly approved program or distance education modality within 24 months of the initial program or initial distance education approval date, the new program or distance education modality will cease to be approved” (*Section IV (E)(6)(f)(i), Rules of Process and Procedure, Standards of Accreditation*). The on-site evaluation team noted that the Full Cosmetologist (Certificate) program, Massage Therapist (Certificate) program, and the Pharmacy Technician (Certificate) program were not operational at the time of the evaluation. The September 5, 2022 OER required the school to submit documentation providing notice of the discontinuation of the programs or, if the school intended to continue offering the programs, evidence that the school has maintained the capacity to offer each program. In response, the school stated “UCHB has submitted discontinuation forms for all the mentioned programs via College360” (*Id.*, p. 31). However, to date, the school has yet to provide notice of discontinuation for the referenced programs, nor evidence that the school has maintained the capacity to continue offering the programs.

Accordingly, the Commission directs UHCB to submit the following:

- a. If the school intends to discontinue the programs, the school must submit documentation demonstrating that the school has uploaded to ACCSC's College 360 database, the applicable Notice of Discontinued Programs or Programmatic Teach Out Plan Approval Form (available at [accsc.org](http://accsc.org)) for each program, in accordance with the instructions and provide a copy of the submission with the response to this report (*Section IV (F)(3)(a), Rules of Process and Procedure, Standards of Accreditation*) or
- b. If the school intends to continue offering the programs, UHCB must provide evidence that the school has maintained the capacity to offer the programs and minimally submit an explanation as to how the school has maintained the capacity, including the equipment, facilities, faculty, curriculum, and learning resource system necessary to deliver the programs.

### **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.

UCHB 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>4</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.

UCHB 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 March 16, 2023**. If a response, the required fee,<sup>5</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission’s office **on or before March 16, 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: [REDACTED]

<sup>4</sup> ACCSC encourages the school to review the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) when formulating its response to this letter. More information is available in the [Resources section](#) at [www.accsc.org](http://www.accsc.org).

<sup>5</sup> ACCSC assesses a \$500 processing fee to a school placed on Warning.

**Current Program:** \_\_\_\_\_ **Start Date:** \_\_\_\_\_  
(month/year you started training)

**Please check the box that best reflects your opinion and experience at this school.**

<b>ADMISSIONS</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
1. A school representative accurately provided me with all of the necessary facts and details about the school before I enrolled.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. All tuition costs and student charges (such as books, fees, tools, etc.) were explained to me.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. I was able to make an informed decision to enroll based on the information provided to me during the admissions process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. My decision to enroll was solely my own and made without pressure from the school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Did you receive a copy of the school catalog (a hard copy or electronic document that describes the school, its programs, policies and procedures) before you enrolled?	<b>Yes:</b>	<input type="checkbox"/>	<b>No:</b>	<input type="checkbox"/>
6. Did you receive a copy of the enrollment agreement that was signed by you and a school official?	<b>Yes:</b>	<input type="checkbox"/>	<b>No:</b>	<input type="checkbox"/>
<b>FINANCIAL AID</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
7. The financial aid representative provided me with accurate information that helped me make an informed decision regarding the affordability of school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. I was able to make an informed decision about the affordability of school without persuasion from the financial aid representative.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. (If you have a student loan): The school explained the amount of my loan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. (If you have student loan): The school explained my loan repayment responsibilities (e.g. frequency of payment and amount per payment).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ACADEMIC PROGRESS</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
11. The school's grading policy is explained clearly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. The school's grading policy is applied fairly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. The school's attendance policy is explained clearly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. The school follows its published attendance policy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. The school reports my academic progress (grades and attendance) to me at regular intervals.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>STUDENT SERVICES</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
16. The school made me aware of services (academic advising and tutoring) that are available to assist me when I have questions about my educational training.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. The school made me aware of services that can assist me if I have issues that affect my ability to attend school and complete the program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. The school made me aware of services that it provides to help me get a job after I graduate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. The school follows its published procedure for handling student concerns/complaints.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>FACULTY</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
20. Instructors are interested in my individual progress throughout the program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Instructors seem knowledgeable about subject areas they are teaching.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Instructors appear to be trained to teach.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23. Instructors answer questions in an understandable way.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24. Instructors have a positive attitude and treat all students fairly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25. Instructors make class interesting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**PLEASE COMPLETE BOTH SIDES OF THIS SURVEY**

<b>LIBRARY/LEARNING RESOURCE SYSTEM (LRS)</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
26. The school provided an adequate orientation on how to use the library/LRS.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27. The library/LRS is staffed and someone is available to help me when I have questions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
28. The library/LRS is useful for completing required assignments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
29. The library/LRS materials are available during and beyond classroom hours.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>FACILITY</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
30. The physical facilities (overall building) are adequately maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31. The classrooms are adequately maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
32. The laboratories are adequately maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>TRAINING EQUIPMENT</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
33. There is sufficient time for hands-on training and practicing on the equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
34. The training equipment is sufficient in quantity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
35. The training equipment is sufficiently up-to-date and kept in good repair.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>OVERALL EDUCATIONAL EXPERIENCE</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
36. I feel good about my decision to attend this school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
37. I would recommend this school to a friend (assuming my friend was interested in this type of training).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

38. What do you expect to do when you complete your training program? (You may choose more than one answer)

- Go to work in an occupation for which my training has prepared me.
- Continue my education in this same occupational area.
- Seek employment in an occupation not related to this training program.
- Continue my education in an occupational area different from this training program.

Other:

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### **COMMENTS (OPTIONAL)**

Please use this space to elaborate on any of your answers to the survey questions, include suggestions to improve the school, or provide any additional comments/concerns about your overall experience at the institution.

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***Thank you for completing this survey. Your comments will be very helpful.***