

July 14, 2025

**ELECTRONIC DELIVERY**

Myotherapy Massage College  
3950 South 700 East, Ste. 100  
Millcreek City, Utah 84107

**School #M059788**  
**Appeals Panel Decision**

Myotherapy Massage College (“MMC” or “the school”) brought this appeal from the February 28, 2025 decision of the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) to withdraw the school’s accreditation and remove MMC from the list of ACCSC-accredited institutions. For the reasons set forth herein, the Appeals Panel voted unanimously to affirm the Commission’s decision to withdraw the accreditation of MMC. Accordingly, pursuant to ACCSC’s *Rules of Process and Procedure*, the Commission’s decision to withdraw the accreditation of the school is hereby final, effective as of the date of this letter.

### **Appeal Process History**

The school timely submitted a Letter of Intent to Appeal a Commission Decision and its Grounds for Appeal. Pursuant to ACCSC’s *Rules of Process and Procedure*, a hearing was held before an independent Appeals Panel on May 6, 2025. This letter sets forth the decision of the Appeals Panel from that hearing.

### **The Commission’s Decision to Withdraw Accreditation**

The history of this matter is set forth in ACCSC’s February 28, 2025 Withdrawal of Accreditation letter (pgs. 1-4) and the grounds for the Commission’s adverse accreditation decision are enumerated therein. Accordingly, the February 28, 2025 Withdrawal of Accreditation letter is incorporated herein by reference. In that letter, the Commission set forth its withdrawal of accreditation action from its February 2025 meeting having found that MMC failed to demonstrate compliance in the following areas:

1. MMC failed to demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and the discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*).
2. MMC failed to meet its burden to demonstrate continuous compliance with accrediting standards and has failed to maintain its eligibility for accreditation through the failure to fulfill all processes, response, directive and reporting requirements in the manner and within the time frame prescribed (*Section I (G)(2) & (J)(1), Rules of Process and Procedure, Standards of Accreditation*).

The February 28, 2025 Withdrawal of Accreditation letter serves to establish the Commission’s grounds for withdrawal of the school’s accreditation based on its findings in the areas listed above (pgs. 4-6).

### **MMC’s Grounds for Appeal**

In its Grounds for Appeal, the school provided information related to the grounds upon which ACCSC took the adverse accreditation decision.

**Financial Soundness:**

In its Grounds for Appeal, MMC does not dispute that the school has failed to demonstrate financial soundness. Specifically, the school stated,

*The past five years have been particularly challenging and dynamic for Myotherapy Massage College. First, the COVID pandemic beginning in early 2020 and then the incapacitation of the [REDACTED] (coinciding with ACCSC's virtual on-site visit). [REDACTED] in March 2021, followed by [REDACTED] in September 2022.*

*Though established as a C-corp, Myotherapy has long functioned more like a charitable non-profit entity—with the [REDACTED] subsidizing operations for decades as needed. However, with the [REDACTED] [REDACTED] he school has been in the midst of a significant restructuring to position the school to be self-sustaining and profitable. Though this effort has taken longer than hoped, the school has made considerable progress—we have reduced administrative costs and increased revenues through expanding enrollment (March 30, 2025 MMC Grounds for Appeal, pg. 2).*

The school also stated that:

*Given the decades-long partnership between Myotherapy and ACCSC, I had hoped that the Commission would look beyond the articulation of process and procedures and at least take into consideration Myotherapy's student outcomes and particular circumstances related to organizational changes when deciding between placing the school on probation or withdrawing accreditation (Id., pg. 3).*

In the Appeal Hearing, [REDACTED] stated that:

*We don't take issue with the facts and the rationale that have been presented in the withdrawal letter. But I do believe that understanding the context within which myotherapy has functioned during these four years is relevant and our performance over the last four years in terms of the bottom line student outcomes and student satisfaction and so forth. (May 6, 2025 Hearing Transcript, pg. 6)*

[REDACTED] also expounded on the issue of the [REDACTED] the transition of ownership to the [REDACTED] and that they "...no longer want to be involved with Myotherapy" (Id., pg. 9). [REDACTED] also posited that MMC is a small school with an average MBLEX pass rate above the national average (Id., pgs. 7 & 11-12) and stated the following:

*Now, I would say that the strength of the school is much stronger than it's been previously. On all fronts, other than our financial status, we're very strong. We're poised for continued growth and ongoing improvement, but we're starting from a pretty strong point. The challenge is the ownership. It's amazing to me that it's taken this long, but the fact that so many schools have closed and that myotherapy has this long history of not making any money doesn't make it a particularly attractive investment. We're just reaching that crossover (Id., pg. 13).*

[REDACTED] made two other points at the hearing for the Appeals Panel to consider. First was that of the administrative challenges faced by small schools and second that the administration changed completely over the last four years and the associated "learning curve" (Id., pg. 18).

During the hearing, the Appeals Panel inquired as to whether the school had any evidence of progress toward finding and securing a new owner for the school. [REDACTED] explained that there is an individual who has expressed interest but that as of the date of the hearing no agreement had been reached.

In these regards, the Appeals Panel found that the information cited by the Commission in its February 28, 2025 letter describing the financial position of the school was not contested by MMC and that the Commission provided the school a lengthy period of time to demonstrate improvement and to achieve a level of financial soundness that would help to ensure that the school can meet its obligations to students in an ongoing manner. The Appeals Panel did take into account the school's points regarding school size and student pass rates on the MBLEX, however, the panel did not see these as sufficiently mitigating factors such that the Commission was arbitrary, capricious, or erroneous in holding the school accountable to *Section I (C)(1), Substantive Standards, Standards of Accreditation* and the requirement for MMC to demonstrate financial soundness.

### **Timely Submission of Materials:**

This issue stems primarily from the school's failure to submit its Self-Evaluation Report required to complete the renewal of accreditation process and that the school submitted its most recent financial statements well beyond the deadline to do so. The February 28, 2025 Withdrawal of Accreditation letter states the following in these regards:

*The Commission determined that it simply cannot continue in a review process where the school fails to submit materials and to comply with accrediting standards and requirements within prescribed timeframes. Taking the school's history and the multiple reviews which have already been given, the Commission determined it is untenable to continue the school's accreditation based on Myotherapy Massage College's ongoing and persistent failure to meet its burden in the accreditation process (ACCSC February 28, 2025 Withdrawal of Accreditation Letter, pg. 6).*

The school did not address this issue in its Grounds for Appeal, but during the hearing the Appeals Panel inquired as to these matters. In response, [REDACTED] stated that there was a "huge misunderstanding" between himself and the staff assigned to complete the work which caused the delay but that overall "the financial piece was preemptive" (May 6, 2025 Appeal Hearing Transcript, pgs. 27-28). With regard to the financial statement delay, [REDACTED] indicated that "there's only a certain number of accounting firms that can do this work" and that the "other factor that delayed it even further was I needed to have [REDACTED] to pay for the audit and I didn't have it. You know, I had to scramble together to pull that together on top of everything else, you know" (*Id.*, pg., 32).

The Appeals Panel took the school's explanations into account and found that the Commission has clearly stated expectations for the submission of materials and that [REDACTED] himself had attended the ACCSC Accreditation Workshop where the submission requirements for the Self-Evaluation Report are explained. Moreover, given the Commission's findings regarding the school's financial position, it is reasonable for the Commission to expect financial information to be submitted as required such that a timely assessment can be undertaken to determine the financial soundness of the school.

### **Appeals Panel Decision**

*Section VIII (B) of the Commission's Rules of Process and Procedure, Standards of Accreditation*, provides that on appeal, the school has the burden of proving that the Commission's decision to withdraw accreditation "was arbitrary, capricious, or otherwise in substantial disregard of the criteria or procedures of the Commission, or not supported by substantial evidence in the record on which the Commission took action." ACCSC's *Rules of Process and Procedure* provide that the Appeals Panel has the authority to affirm, remand, or amend the Commission's decision to withdraw MMC's accreditation.

Based on a complete and thorough review of the record in this matter, the Appeals Panel concluded that MMC has not carried its burden of proof on appeal and consequently unanimously affirms on all grounds

the Commission's decision to withdraw the school's accreditation. Accordingly, the Commission's decision to withdraw the accreditation of the MMC is hereby final, effective as of the date of this letter.

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In accordance with *Section VII (Q)(7), Rules of Process and Procedures, Standards of Accreditation*, the school may re-apply no sooner than nine months from the date on which the withdrawal of accreditation becomes effective. Accordingly, MMC may not re-apply for accreditation sooner than April 14, 2026.

The school may submit comments **on or before July 24, 2025** in accordance with the enclosed Public Comment Disclosure Form to accompany the Commission's disclosure of this final adverse accreditation action in accordance with *Section X (C)(4) & (D)(4), Rules of Process and Procedure, Standards of Accreditation*.

For additional information pertaining to this matter, please contact me directly at [REDACTED]

[REDACTED]

Executive Director

Encl.: ACCSC Public Comment Disclosure Form