



Accrediting Commission of Career Schools and Colleges

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May 29, 2026

ELECTRONIC DELIVERY

██████████
Director
Myotherapy Institute
245 South 84th Street
Lincoln, Nebraska 68510

School #M070147
Probation

Dear ██████████:

At the February 2026 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue Myotherapy Institute located in Lincoln Nebraska on Warning with a Commission Directed Announced On-site Evaluation. In addition, the Commission considered the school’s Financial Reporting status and previous decision to defer action on the school’s Heightened Cash Monitoring 2 (“HCM2”) status with the United States Department of Education (“the Department”). Upon review of the December 17, 2025 On-site Evaluation Report (“OER”) related to the Commission Directed Announced Visit as part of the school’s Application for Renewal of Accreditation and Application for a Change of Control, the Commission’s October 22, 2025 letter regarding the school’s HCM2 status with the Department, and the school’s responses, the Commission voted to place Myotherapy Institute on Probation with a subsequent review scheduled for ACCSC’s August 2026 meeting. The reasons for the Commission’s decision are set forth below.

History of Commission Review

- At the November 2024 meeting, the Commission considered the Application for Renewal of Accreditation; the Application for a Change of Control; and Financial Report submitted by Myotherapy Institute. Upon review of the September 7, 2024 OER, the May 15, 2024 Commission letter regarding the Financial Report, and the school’s responses, the Commission voted to place Myotherapy Institute on Warning.
- At the May and August 2025 meetings, the Commission voted to continue Myotherapy Institute on Warning and directed the school to receive a Commission Directed Announced On-Site Evaluation.

Area of Non-Compliance with Accrediting Standards

1. Myotherapy Institute has failed to demonstrate that:
 - The school enforces a policy of acceptable student attendance ensuring sufficient levels of student attendance such that the required knowledge, skills, and competencies can be reasonably achieved and
 - The school establishes authentication policies and processes regarding student verification in a distance education course or program (*Section IX (C)(4), Substantive Standards, Standards of Accreditation*).¹

As noted in the December 17, 2025 OER, Myotherapy Institute delivers courses through asynchronous online instruction for both clock-hour non-degree students and academic associate degree students. For

¹ A school with approval to offer coursework/programs via distance education retains responsibility for the quality of the programs and courses of study offered through distance education methods and the achievement of expected and acceptable outcomes (*Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation*)

both programs, faculty track attendance based on student participation in discussions and completion of assignments, as reported to the team during the evaluation. However, the on-site evaluation team questioned how the school verifies that non-degree, clock-hour only students fulfill all required clock hours when enrolled in asynchronous distance education courses.

In response to the OER, the school provided the following narrative:

Myotherapy Institute utilizes the learning management system Canvas to administer online, asynchronous courses to students in both the diploma and associate degree programs. When courses are designed, weekly assignments are developed to represent the number of hours per week that students should be interacting with the course as outlined in our allocation of clock hours and outline of a degree program. In some courses, students are expected to turn in notes that can be obtained from reading the assigned text or reviewing a slideshow that corresponds with the material for that week. Students are also asked to complete assignments to demonstrate their understanding of course material, participate in discussions, and take quizzes. Completion of these assignments is tracked on a weekly basis by instructors, and instructors take attendance based on assignment completion. Students that complete some assignments but not others are marked as Tardy based on the number of assignments (and therefore hours) not completed. Students who complete no work are marked as absent for the week. Once students complete the assignments, their attendance is updated and they are given credit for their made up hours. Attendance and make up hours are reconciled at the end of each quarter by [REDACTED] as the school director (January 10, 2026 Myotherapy Institute Response, pg. 40).

Myotherapy Institute also included a copy of the school’s catalog with the attendance and tracking policies and attendance reports and Canvas grade logs for one student for the period of October through December 2025. The policy shows that “100% attendance is required for all scheduled classes,” that “Daily attendance is recorded for each scheduled session,” and “Absences are considered unexcused unless properly documented and approved in advance” (*Id.*, pg. 212). Myotherapy Institute did not provide information regarding excused hours and how the school ensures that students make up these hours.

The school’s full response, however, does not support the narrative nor the practice of awarding clock hours in an asynchronous program. The school also provided attendance reports for an individual student which shows that the student did not complete 100% attendance for all classes as follows:

Course	Scheduled Hours	Hours Attended	Percent Attended	Days Absent	Days Tardy	Claimed Net Total Hours*	Claimed Percent Attended*
Pathology	30	21	70%	2	2	28	93.3%
Massage Seminar & Seated Massage	70	56.3	80%	2	3	70	100%
Advanced Techniques Clinic	127.3	107.3	84%	4	1	131.3	103.1%
Massage Neuromuscular	60	36	60%	4	0	60	100%

* The attendance reports show the completed scheduled hours and make up hours.

Although the “Net Total Hours” shows near completion of the “Scheduled Hours,” the recorded “Hours Attended” fall significantly below the school’s requirements. Instead, the attendance reports show

numerous “makeup” hours for this student. In addition, the grade logs show that this student was delinquent in submitting assignments and completing quizzes 49% of the time (38 late submissions out of 77 assignments or quizzes). Per the narrative above with instructors taking attendance based on assignment completion, it appears that the student completed no work for some weeks and was marked absent, and then completed some, but not all, assignments during other weeks and was marked as tardy.

Based on the information provided, the school did not demonstrate how students complete the requisite number of hours in the clock-hour Massage Therapy (Diploma) program. Specifically, it is unclear how the school monitors attendance on an hour-by-hour basis, including the make-up hours for tardiness and absences, to ensure that students complete the required hours.

Further, based on additional concerns in #2 below, the school failed to show that students are achieving the expected outcomes of the program due to the school’s inability to effectively track attendance in a clock-hour only, asynchronous, distance education course/program. Based on the foregoing, the Commission directs the school to submit the following:

- a. A description of and justification for the school’s methods of delivering a clock-hour only, asynchronous, distance education course/program;
- b. The school’s attendance policy for students enrolled in a clock-hour only, asynchronous, distance education course/program;
- c. An explanation as to how the school tracks attendance in the Massage Therapy (Diploma) program to ensure that students complete all required hours;
- d. The school’s policy related to excused hours to include information regarding how students make up these hours;
- e. A list of all students enrolled in Massage Therapy (Diploma) program from the period of January 1, 2026 through June 30, 2026;
- f. Attendance logs and grade reports for each student included in (e.) above; and
- g. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.

2. Myotherapy failed to demonstrate that:

- For every program, there are detailed and organized instructional outlines and course syllabi showing 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*) and
- The school notified the Commission of non-substantive and substantive changes in advance of such changes taking effect or being implemented in accordance with the provisions set forth in ACCSC’s *Rules of Process and Procedure (Section IV (A)(4), Rules of Process and Procedure, Standards of Accreditation)*.

Upon review of the school’s published catalog and course syllabi, the on-site evaluation team identified numerous discrepancies as referenced in the OER. Due to the differences in clock-hour and credit-hour allocations by course, the team could not verify that the programs are being offered as approved and as represented in the school’s catalog. Additionally, the on-site evaluation team noted that 11 courses captured in the catalog did not have a syllabus.

In response to the December 17, 2025 OER, the school attributed the discrepancies in course hours and titles “to the delay in approval for program modifications from ACCSC” (*Id.*, pg. 39). Specifically, Myotherapy Institute indicated that the school submitted non-substantive modifications to the Nebraska Department of Education and ACCSC in March 2025. Although Nebraska approved the modification in June 2025, ACCSC has not approved the modification due to the school’s Warning status. The school completed a reconciliation of courses to ensure alignment and discovered that the “courses are no longer aligned with what is approved by the Nebraska Department of Education” (*Id.*). As part of the response, Myotherapy Institute included an Allocation of Hours for Clock Hour Programs form for the Massage Therapy (Diploma) program and an Outline of a Degree Program for the Massage Therapy (AAS) program along with the school’s catalog and course syllabi.

The school also submitted transcripts for the most recent graduates, three from the Diploma program and one from the AAS program. The school included the following narrative regarding the transcripts:

Please note on the Diploma student transcripts the addition of Deep Tissue and Face Massage. These courses are not currently part of the Diploma program, but they are essential courses for graduates to have. They have been proposed to add to the program, but Diploma students took these courses in addition to their currently approved Diploma program. These two courses cause the number of hours completed for Diploma students to equal 1,052 instead of 1,002. Once the proposed program modifications have been approved, the Diploma program will consist of 1,010 hours and formally include Deep Tissue and Face Massage (Id.).

From the school’s own admission, Myotherapy Institute is not offering the Massage Therapy (Diploma) program as approved by the Commission. It appears that the school is also not offering the program as approved by the Nebraska Department of Education. The Allocation of Hours for Clock-Hour Programs form shows the total clock hours as 1,002. This differs from the 1,000 currently approved by the Commission and the 1,052 hours listed on the three transcripts for Massage Therapy (Diploma) graduates and referenced in the school’s narrative. These transcripts include the 30 clock-hour Deep Tissue course and the 70 clock hour Spa Treatments and Facial Massage course which are not listed on the school’s Allocation of Hours for Clock-Hour Programs outline. The Commission also noted that the transcripts for graduates #526 and #529 show that these students took the 30 clock-hour Deep Tissue course in Winter 2024 which occurred prior to the school submitting the modifications.

In addition, upon review of the Allocation of Hours for Clock-Hour Programs and Outline of a Degree Program submitted as part of the response, the Commission found that the school appears to be calculating clock and credit hours inconsistently between the non-degree, clock-hour only program and the credit-bearing degree program. Specifically, the Commission noted that both programs contain several of the same courses with the identical course descriptions in the school’s catalog. However, because the degree program contains outside work that the non-degree program does not, the courses are not equivalent and cannot be measured the same way. As an example, both programs include the Swedish Massage course which is described in the school’s catalog as:

Swedish Massage 101

An introductory course designed to introduce students to Swedish massage therapy. Students will learn the five basic Swedish massage movements, be able to drape clients, understand the professional environment and sanitary guidelines, understand the basics of professional ethics, and be able to administer a complete full body Swedish massage. 60 clk/5.5 cr (Id., pg. 203).

The school’s Allocation of Hours for Clock-Hour Programs shows this course as 30 didactic hours and 30 supervised laboratory hours for a total of 60 instructional clock hours. Meanwhile, the Outline of a Degree Program shows the same didactic and supervised laboratory hours along with 120 additional outside work hours. The Commission noted several other discrepancies with how courses are listed in the school’s syllabi, catalog, and program outlines (e.g. Introduction to Community Care, Massage Seminar, Seated Massage). The Commission reminds Myotherapy Institute that a clock hour and credit hour are defined differently and found that the school is measuring the same course in both a clock hour only, non-degree program and a credit bearing degree program.

Further, the Commission noted that the school utilizes the same syllabi for multiple courses offered in the AAS and Diploma programs with several discrepancies. For example, the syllabus and catalog for the Introduction to Community Care course lists 113 clock hours / 5.0 credit hours. The Outline of a Degree Program shows 130 total instructional clock hours representing 10 didactic hours, 20 supervised lab hours, and 100 externship / clinical hours. The Allocation of Hours for Clock-Hour Programs shows the same number of didactic and supervised laboratory hours but with 83 externship hours for a total of 113 clock hours. Further, the syllabus shows the externship hour requirements as 80.

In addition, the school lists the Massage Seminar and Seated Massage course as one combined course with “70 clock hours, 5.5 credits” in the catalog and on the syllabus. The Outline of a Degree Program shows a Massage Seminar with 40 didactic hours for 2.5 credit hours and a separate Seated Massage course with 30 didactic hours and 60 additional outside work clock hours for 3.0 credit hours. The Allocation of Hours for Clock-Hour Programs also shows separate courses with 40 didactic hours for the Massage Seminar and 30 didactic hours for the Seated Massage course. The chart below illustrates examples of the discrepancies:

Course	Allocation of Clock Hours (Dip. Program)	Outline of a Degree Program (AAS Program)	Catalog	Syllabi
Introduction to Community Care	113 clock hours - 10 didactic clock hours - 20 supervised lab clock hours - 83 clinical externship hours	130 clock hours / 5.0 credit hours - 10 didactic clock hours / .67 credit hours - 20 supervised lab clock hours / 1 credit hour - 100 clinical externship clock hours / 3.33 credit hours	113 clock hours / 5.0 credit hours (no separation of non-degree and degree program)	113 clock hours / 5.0 credit hours Externship Hour Requirements: 80
Massage Seminar	40 didactic clock hours	40 clock hours / 2.5 credit hours - 40 didactic	Course Name: Massage Seminar and Seated Massage 114 70 clock hours / 5.5 credit hours	Course Name: Massage Seminar and Seated Massage 70 clock hours / 5.5 credit hours
Seated Massage	30 didactic clock hours	90 clock hours / 3.0 credit hours - 30 didactic clock hours - 60 outside work	Course Name: Massage Seminar and Seated Massage 114 70 clock hours / 5.5 credit hours	Course Name: Massage Seminar and Seated Massage 70 clock hours / 5.5 credit hours

Given the number of discrepancies noted throughout the response, the school failed to demonstrate consistency in the organization and delivery of the courses/programs. Based on the foregoing, the Commission directs Myotherapy Institute to submit the following:

- a. An explanation of the differences in total clock and/or clock and credit hours for courses that are shared between the Massage Therapy (Diploma) and Massage Therapy (AAS) programs;
- b. A description of the required hours of Outside Work in the Massage Therapy (AAS) program and how courses in the degree program that contain outside work differ from the non-degree program. Please also include an explanation as to how the school monitors the outside work.
- c. A description of the corrective action taken by the school to ensure consistency in how the program is advertised, offered, and approved;
- d. A copy of the program and course descriptions for both the Massage Therapy (Diploma) and Massage Therapy (AAS) programs as published in the school's catalog;
- e. A copy of each of the school's syllabi that show the scope and sequence of the subject matter for each program and the clock-hours/ credit hours earned for each course;
- f. If applicable, a revised Program Modification Report (Non-Substantive Modification or Substantive Modification) for the Massage Therapy (Diploma) program and/or Massage Therapy (AAS) program. The previous fee will apply to this resubmission if applicable.
- g. An [Allocation of Hours for Clock-Hour Programs Form](#) for the Massage Therapy (Diploma) program;
- h. An [Outline of a Degree Program](#) for the Massage Therapy (AAS) program;
- i. A list of the five most recent graduates since the response to the December 17, 2025 OER and transcripts for these individual; and
- j. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

Additional Areas of On-Going Concern

1. Myotherapy Institute must demonstrate compliance with standards relative to management and administration, as follows:
 - a. Myotherapy Institute must demonstrate full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*).
 - b. Myotherapy Institute must demonstrate that the school has a sufficient number of managers and administrative employees necessary to support the school's operations (*Section I (A)(1)(c), Substantive Standards, Standards of Accreditation*).
 - c. Myotherapy Institute must demonstrate that owners are qualified for their particular roles and possess the appropriate education, training, and experience commensurate with the level of their responsibilities (*Section I (A)(1)(b), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team noted that the school's change of control occurred in September 2023. [REDACTED], who serves as the Campus Director, Director of Education, Student Services Coordinator, Provost, and primary contact for registrar duties has been with the school since October 2024. The team noted that financial aid functions are conducted remotely from the school's headquarters in Texas and that this administrative arrangement appears to negatively impact the student

experience as demonstrated in the student survey results. Furthermore, the on-site evaluation team found that it remained unclear whether the owner, Graduate America, possessed the requisite training and experience to operate a post-secondary educational institution in compliance with accrediting standards.

In response to the OER, Myotherapy Institute's narrative indicates that the school has three on-site managers and administrative employees: Campus Director [REDACTED]; [REDACTED], Admissions; and [REDACTED], Career Services Coordinator and Externship Coordinator. However, the organization chart shows [REDACTED] as the Director/Provost; [REDACTED] as the Enrollment & Admission Specialist; and [REDACTED] as Student Services/Faculty. The Commission also noted other discrepancies in job titles in the school's response. Myotherapy Institute's October 2025 catalog lists [REDACTED] as Director of Education and [REDACTED] as Director of Partnerships. Meanwhile, the organization chart shows these individuals as Director/Provost and COO/Instructor, respectively.

Myotherapy Institute also provided job descriptions for the Director of the Institution; Chief Executive Officer (CEO); and Human Resources and Compliance Manager positions and included a narrative about the qualifications of the owner. The Commission found that the school did not provide job descriptions for the other positions listed on organization chart, including the Financial Aid Administrator and COO/Instructor, or information such as resumes and Staff Personnel Reports for managers and administrative employees to show on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution.

Overall, the response is not clear as to the specific qualifications and responsibilities for each member of the school's management and administrative staff. In addition, it is not clear what operational areas occur at the school versus off-site, which is of particular relevance based on student dissatisfaction related to financial aid (see item #5 below).

Based on the foregoing, the Commission directs Myotherapy Institute to submit the following:

- a. An Organizational Chart listing all positions and names of personnel for each position;
- b. A Staff Personnel Report² for each management and administrative staff member listed on the chart;
- c. Documentation of qualifications for all management-level and administrative staff to demonstrate experience and ability to manage a school in compliance with accrediting standards;
- d. For each operational area below, explain how this area is managed and all staff who are responsible for providing these support services to students and the location of these individuals:
 - Admissions;
 - Billing;
 - Financial Aid;
 - LRS Orientation/Assistance/Maintenance;

² Available for download on the [Forms and Reports page](#) of the ACCSC website.

- Academic Advising;
 - Student Services;
 - Student Records/Grades; and
 - Career Services/Employment Assistance;
- e. A justification as to how the management structure and administrative capacity are adequate to support the school's operations, student services, and educational programs;
- f. A justification that the ownership and controlling entity are sufficiently qualified to operate Myotherapy Institute in compliance with ACCSC accrediting requirements taking into account the number and scope of the items contained in this letter; and
- g. Any additional information that Myotherapy Institute believes shows that the school has sufficient managers and administrative employees in place to manage and support its operations.
2. Myotherapy Institute 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*). In response to the OER, the school submitted its Institutional Effectiveness Plan and an Institutional Effectiveness Summary Table, which shows five functional areas, assessment findings, improvement actions since October 2025, and the responsible party and review schedule. Specifically, the improvement actions are as follows as stated on page 66 of the school's response:

Functional Area	Improvement Action (Post-Oct 2025)
Management & Administration	Standing leadership review meetings implemented with documented action items
Faculty & Staff Development	Faculty development plan and training log implemented
Educational Program Curriculum	Formal curriculum review summaries implemented
Learning Resources & Equipment	Resource review log implemented
Student Achievement Outcomes	Student outcomes report with action items implemented

To document assessment and improvement activities since the October 2025 on-site evaluation, Myotherapy Institute submitted a Leadership and Management Review Meeting agenda scheduled for February 2026; a Policy and Procedures Addendum related to faculty prior work experience evaluation dated January 10, 2026; faculty evaluations; and a policy document related to faculty and faculty development. With the exception of the faculty development plan, the Commission found that the documentation does not align with the improvement actions. In addition, although the leadership and management review meeting agenda includes items of improvement actions such as student achievement rates, the meeting did not occur as of the date of the school's response.

Based on the foregoing, the Commission determined that additional information is necessary and directs Myotherapy Institute to submit the following:

- a. An updated description of any institutional assessment and improvement activities implemented since the October 2025 on-site evaluation. This may include the school’s Institutional Effectiveness Summary Table;
 - b. Documentation of assessment and implementation activities since the October 2025 on-site evaluation; and
 - c. Any additional information that the school believes will show that the school engages in significant and ongoing institutional assessment and improvement activities.
3. Myotherapy Institute must demonstrate successful student achievement by maintaining acceptable rates of graduate employment in the career field for which the school provided education as well as acceptable pass rates on licensure/certification exams where required by governmental entities to work in a particular career field (*Section VII (B)(2)(b), Substantive Standards & Appendix VI, Standards of Accreditation*). In response to the December 17, 2025 OER, the school reported the following student achievement rates using a January 2026 Report Date on the Graduation and Employment Charts and Licensure / Certification Examination Pass Rates Charts:

Program (Credential)	Length Months	Program Graduation Rate	ACCSC Benchmark Graduation Rate	Program Employment Rate	ACCSC Benchmark Employment Rate	Program Licensure Rate	ACCSC Benchmark Licensure Rate
Massage Therapy (Diploma)	12	71%	55%	20%	70%	40%	70%
Massage Therapy (AAS)	12	100%	55%	100%	70%	100%	70%

The employment and licensure rates for the Massage Therapy (Diploma) program fall below ACCSC’s student achievement benchmark rates.³

As noted in the OER, the on-site evaluation team found that the student achievement rates as reported in the 2025 ACCSC Annual Report reflect cohorts which began between October 2022 and August 2023. Myotherapy Institute finalized the change of control transaction on September 22, 2023. As such, the team noted that the rates did not reflect the efforts of the current institutional owners and the team questioned the student achievement outcomes since the change of control. The Graduation and Employment Charts using a January 2026 Report Date reflect student starts from the period of May 2023 through March 2024 with students graduating in May 2024 or August 2024, several months after the change of control.

Also, in the response, the school did include contemporaneous data showing a list of three Massage Therapy (Diploma) graduates since the change of control with students starts in August and October 2024 and graduation dates in August 2025 and October 2025. Of these three graduates, only one gained employment in the Massage Therapy field. Although the school included Retention Charts showing positive data in both Massage Therapy programs, the response does not include additional information regarding strategies or initiatives to improve employment and licensure pass rates.

Based on the foregoing the Commission directs Myotherapy Institute to provide the following:

- a. The school’s student achievement improvement plan which specifically addresses any enhancements or modifications made in the following areas:

³ Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.

- i. Curriculum and program design;
 - ii. Facilities and equipment;
 - iii. Training-related resources;
 - iv. Student Services; and
 - v. Career services and employer engagement;
- b. An assessment of the effectiveness of the school’s student achievement improvement efforts;
- c. An evaluation of current student achievement trends including an assessment as to when the school expects the Massage Therapy (Diploma) program’s employment and licensure rates to meet ACCSC’s benchmark rates;
- d. A Graduation and Employment Chart for the Massage Therapy (Diploma) program using a **July 2026 Report Date**;
- e. 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 who started in the program, provide the following information (sample text):

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Massage Therapy (Diploma)	01/10/2024	12/15/2024	N/A
2	12346	Massage Therapy (Diploma)	01/10/2024	N/A	04/01/2024

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

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

- iii. For each graduate classified as employed in the field⁴ (line #14), provide the following:

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

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

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

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

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

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

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

⁴ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

- f. A Licensure/Certification Examination Pass Rates Chart for the Massage Therapy (Diploma) program using a **July 2026 Report Date**; and
 - g. Any additional information, to include contemporaneous employment or licensure data that the school believes will be useful to the Commission in making a determination regarding the school's student achievement outcomes.
4. Myotherapy Institute must demonstrate that the school supports student achievement rates through the school's verifiable records and documentation of initial employment of its graduates (*Section VII (B)(2)(b) Substantive Standards, Standards of Accreditation*). Specifically, the on-site evaluation team found that the two records for self-employed graduates did not include attestations to verify that the employment is valid per ACCSC's *Guidelines for Employment Classification (Appendix VII, Standards of Accreditation)*. In its response, Myotherapy Institute explained that the school sends students surveys approximately three months after graduation. Graduates indicating that they are employed are sent a follow up form to verify employment. If a student does not respond, the school sends multiple emails and then attempts to contact the graduate by phone. If the graduate fails to respond, the school conducts a web search to see if the student started a business and looks up licensure information through the Nebraska Department of Health of Human Services (please note that results of a web search are insufficient to verify graduate employment). Per ACCSC's *Guidelines*, for regular employment, the employment classification is verified by the school (and verifiable by third parties such as the Commission) when the school secures written documentation from the graduate or employer verifying the employment and that the employment is related to the student's program of study at the school. In cases where a school can show diligent efforts have been made to secure such written documentation without success, the school maintains documentation of verbal verification that includes the following:
1. The graduate's and employer's name and contact information;
 2. An attestation by school staff confirming the verbal employment verification with the employer and the date of verification; and
 3. An attestation by school staff confirming the verbal employment verification with the graduate and the date of verification.

For self-employment, the school must secure written documentation from the self-employed graduate verifying that the employment is valid that includes the graduate's name and contact information and an attestation by the graduate confirming 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;
- The graduate is earning consistent training-related income; and
- That any required licensure for employment has been achieved, if applicable - (e.g., this would not apply in cases where the state or regulatory entity would allow an individual to work under a licensed practitioner before obtaining licensure).

While Myotherapy Institute provided self-employment documentation for one graduate that appears to meet ACCSC's *Guidelines*, the Commission determined that additional information is needed to ensure that the school appropriately verifies initial employment for all graduates and follows its own employment verification policies. Accordingly, the Commission directs the school to submit the following:

- a. The school’s policies and procedures for recording and verifying graduate employment. Please note any updates, if applicable;
- b. A copy of the school’s current verification form or other tool the school is utilizing to verify employment;
- c. For up to 5 graduates whose in-field employment was verified since the school’s response to the December 17, 2025 OER, provide the following information (sample text):

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Address & Phone #	Date of Initial Employ.	Date Employ. Verified	Descriptive Job Title	Job Duties
1	12345	Massage Therapy (Diploma)	1/10/25	12/15/25	Jane’s Spa, 123 Sample Way, Lincoln, NE 402.333.1234	1/4/26	3/1/26	Massage Therapist	Provide deep tissue massages to clients
2	12346	Massage Therapy (Diploma)	1/10/25	12/15/25	My Clinic, 456 Maple Dr. Lincoln, NE 402.444.5678	2/1/26	4/15/26	Massage Therapist	Perform massages, assist with client intake

- 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 written documentation from the graduate verifying that the employment is valid, which includes the following:
 - The graduate’s name and contact information;
 - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
 - An attestation that the graduate is earning consistent training-related income; and
 - In cases where licensure is required for employment, an attestation that such licensure has been achieved;
 - 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
 - iv. For any of the above forms that include typed signatures, provide corresponding materials to support the validity of the electronic signature (DocuSign, Adobe Digital ID, email submission of form, etc.); and
 - e. Any additional information that the school believes will show the school’s compliance with ACCSC’s requirements regarding employment verification.
5. Myotherapy Institute must demonstrate that the school maintains adequate student services and resources that support its students (*Section VI (A)(2), Substantive Standards, Standards of Accreditation*) and that the school continually monitors and addresses student satisfaction and student needs for services (*Section VI (A)(5), Substantive Standards, Standards of Accreditation*). Results from

the student survey conducted during the on-site evaluation indicated 30% dissatisfaction with regard to financial aid. The on-site evaluation team noted that financial aid functions are conducted remotely from the school’s operational headquarters in Texas. Upon review of the student survey results and commentary, the team noted that this administrative arrangement appeared to impact the student experience, as commentary highlighted limited availability of the staff person responsible for financial aid and delays in responses to student questions and communications. In response to the December 17, 2025 OER, Myotherapy Institute provided student survey forms completed by six students. Although the school did not indicate when students completed the survey, the answers regarding financial aid questions are as follows:

Question	Strongly Agree	Agree	Disagree	Strongly Disagree	Did Not Answer
The financial aid representative provided me with accurate information that helped me make an informed decision regarding the affordability of school.	2	2	1	1	0
I was able to make an informed decision about the affordability of school without persuasion from the financial aid representative.	4	2	0	0	0
(If you have a student loan): The school explained the amount of my loan.	2	1	1	0	2
(If you have student loan): The school explained my loan repayment responsibilities (e.g. frequency of payment and amount per payment).	2	0	3	0	1

As part of the response, Myotherapy Institute attributed dissatisfaction related to the school’s Heightened Cash Monitoring 2 status. The school’s response states,

Specifically, student commentary reflected delays in response time and limited staff availability during the period in which financial aid operations were transitioning to federally compliant Heightened Cash Monitoring Level 2 (HCM2) procedures and remote processing workflows (Id., pg. 31).

In addition, the school explained mechanisms for monitoring student needs, strategies implemented to address identified factors, and how the school measures the effectiveness of the strategies. The school hired additional certified financial aid personnel; implemented a standardized response time to student inquiries; and strengthened coordination between financial aid staff and campus staff.

Overall, the results show that it appears that financial aid remains a concern for at least three of the six students. In addition, although Myotherapy Institute states that the school hired additional financial aid personnel, it is unclear if this staff works remotely or at the Lincoln school and if this has improved the responsiveness to students.

Based on the foregoing, the Commission determined that additional information is necessary and directs Myotherapy Institute to submit the following:

- a. A narrative regarding financial aid services and support available to students. Please include the number of financial aid personnel and indicate if they work at the school or remotely;
- b. Summary results of a student survey of at least 50% of the student population using either the ACCSC student survey or one that is substantially similar including the percentage of students surveyed;
- c. For any area in which students expressed less than 80% satisfaction, provide the following:

- i. An assessment of factors impacting the rates of student satisfaction;
 - ii. An update regarding the previous strategies implemented to improve student satisfaction, and how the strategies implemented by the school have impacted rates and are intended to target those factors; and
 - iii. Documentation to show that the activities listed above took place; and
 - d. Any additional information that the school believes will show the school’s compliance with accrediting standards in this area.
6. Myotherapy Institute must demonstrate compliance with accrediting standards relative to educational administration as follows:
- a. Myotherapy Institute must demonstrate that its faculty engage in ongoing development of teaching skills as part of its plan for faculty improvement (*Section III (B)(4), Substantive Standards, Standards of Accreditation*) which specifically addresses teaching skills and instructional methods in a distance education environment (*Section IX (G)(2), Substantive Standards, Standards of Accreditation*) and
 - b. Myotherapy Institute must demonstrate that the school’s faculty engage in ongoing faculty assessment and professional development activities (*Section III (A)(2), Substantive Standards, Standards of Accreditation*).

In response to the December 17, 2025 OER, as referenced in item #2 above regarding institutional assessment and improvement activities, Myotherapy Institute submitted its policies related to faculty from the school’s polices and procedures manual and a policy and procedures addendum about faculty prior work experience evaluation. The school also included its hiring, training, and onboarding policy. The Commission found that these documents do not include teaching skills and instructional methods in a distance education environment.

Regarding professional development activities, the school provided a list of three instructors and faculty evaluations conducted in January 2026. The Commission found that these evaluations are self-evaluations completed by the faculty members and signed by the Director. This documentation does not show evidence of assessment by the Director or Director of Education. In addition, Myotherapy Institute included professional development topics such as a Stars Student Information System training about attendance tracking in September 2025 as part of the school’s staff meeting and an October 2025 “informal brainstorming session related to the upcoming development of student and faculty Canvas support hubs” (*Id.*, pg. 34). ACCSC’s *Standards of Accreditation* state that professional development activities include elements such as:

- Continuing education in the subject area(s) taught;
- Teaching skill development;
- Instructional methodology development;
- Membership in trade and professional organizations as appropriate; and
- Other elements appropriate for the ongoing professional development of faculty.

It is unclear whether training regarding attendance tracking and the development of support hubs meets this definition of faculty development. Although future professional development activities scheduled for 2026 including Effective Feedback in an Online Environment; Student Engagement in an Online

Environment; and Grading Practices and Using Rubrics seem better suited to the definition of professional development activities referenced above, these topics/activities are scheduled after the Commission’s review of the school’s OER response.

Overall, the Commission determined that additional information is needed to ensure that instructors engage in ongoing development of teaching skills as part of its plan for faculty improvement which specifically addresses teaching skills and instructional methods in a distance education environment. Accordingly, the Commission directs Myotherapy Institute to submit the following:

- a. A roster of all current faculty that engage in instruction;
 - b. Evidence of evaluation for all faculty members listed in item (a.);
 - c. Evidence of professional development for all faculty members listed in item (a.);
 - d. Documentation of ongoing development of teaching skills as part of its plan for faculty improvement which specifically addresses teaching skills and instructional methods in a distance education environment; and
 - e. Any additional information that the school believes shows compliance with accrediting standards relative to educational administration.
7. Myotherapy Institute must demonstrate compliance with accrediting standards regarding program evaluation as follows:
- a. Myotherapy Institute must demonstrate that the school has a systemic and evidence-based program evaluation process for each occupational program, or each group of related occupational programs designed to:
 - Evaluate curriculum and course content;
 - Assess the appropriateness of that coursework in relation to program objectives;
 - Assess the adequacy of program equipment and supporting resource materials;
 - Assess student achievement outcomes and program viability; and
 - Make revisions to the curriculum as deemed necessary (*Section II (A)(4)(a)(i-v), Substantive Standards, Standards of Accreditation*);
 - b. Myotherapy Institute must demonstrate that the school’s program evaluation process is comprehensive, conducted by faculty and educational administrators regularly, and uses input from internal and external sources including the following:
 - An independent and diverse Program Advisory Committee (“PAC”) for each program area;
 - Student and alumni input collected through sources; and
 - Other resources as useful, needed, and appropriate (*Section II (A)(4)(b), Substantive Standards, Standards of Accreditation*); and
 - c. Myotherapy Institute must demonstrate that Program Advisory Committees for programs or courses of study that include content delivered via distance education includes at least one additional individual with experience in the delivery of distance education programs who is qualified to review and comment on the school’s distance education platform, methods, processes,

procedures, and infrastructure in the context of the program/course content and objectives (*Section IX (D)(6), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team noted that the school’s program evaluation process appeared limited to the single meeting of the PAC and student surveys and did not appear to include alumni input or other resources. Additionally, the team noted that while the school originally intended to have a Program Advisory Committee meeting in July 2025, the school’s only 2025 PAC meeting was scheduled for December, after the on-site evaluation.

In response to the OER, Myotherapy Institute submitted PAC minutes from its December 2025 meeting which includes a roster of individuals in attendance. Although the school identified an individual as a Distance Education Specialist, the school did not provide information to show that this person has experience in the delivery of distance education programs who is qualified to review and comment on the school’s distance education platform, methods, processes, procedures, and infrastructure in the context of the program/course content and objectives. As reflected in the PAC meeting minutes, the distance education specialist provided comments related to the curriculum.

The response indicates, to evaluate its programs, “[t]he school uses a combination of current student surveys, graduate surveys, and annual PAC meetings” (*Id.*, pg. 35). Myotherapy Institute stated that the school collects student surveys at least once a year, sends out surveys of its graduates approximately three months post-graduation, and plans on conducting employer surveys. As part of the response, the school included six graduate surveys from 2024 and 2025 graduates with several showing negative feedback. One graduate wrote, “My pathology course was online + we never met with him or had any lecture videos to teach us the materials” (*Id.*, pg. 152) raising concerns about whether students are achieving the expected outcomes of the program in an asynchronous distance education course as detailed in item #1 in the first section of this letter.

To demonstrate that the school gives consideration to the PAC recommendations, Myotherapy Institute wrote the following:

On recommendations from the PAC members, [REDACTED] have revised lesson plans for in-person instructional weekends to emphasize correct body mechanics and techniques across all courses that have a hands on massage component. In addition, grading rubrics for final exams will be revised to include demonstration of correct body mechanics (Id., pg. 37).

In addition, the school plans on revising module names in Canvas courses to include the weekly topic. The Commission found that the school did not provide documentation of implementation of these activities and questions why the Director of Education was not part of any discussions about lesson-plan revisions or changes to grading rubrics.

Overall, the response does not include sufficient information about the qualifications of the PAC member with experience in the delivery of distance education programs. The Commission also questions how the school evaluates curriculum from external sources. Based on the foregoing, the Commission directs Myotherapy Institute to submit the following:

- a. An updated description of how the school demonstrates that the program evaluation process includes input from external sources;

- b. Documentation to support the efforts described in (a.);
 - c. Qualifications of the PAC member with experience in the delivery of distance education programs;
 - d. Evidence to show that the school gives consideration to the recommendations of the PAC; and
 - e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
8. Myotherapy must demonstrate compliance with instructional materials, as follows:
- a. Myotherapy Institute must demonstrate that the school’s instructional materials are sufficiently comprehensive and reflect current occupational knowledge and practice (*Section II (A)(5)(a), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that when students attend on-campus instruction, the instructional materials—particularly the DVDs used in class—appeared to be outdated. For example, titles such as *Reflexology, Volume 1: The Feet* (2003), *The Thai Massage DVD* (2004), *Facial Massage: The Definitive Collection* (2006), and *Deep Tissue Massage with Dr. James Mally* (2008) were still in use. Consequently, faculty members report that after presenting these videos, the instructor must update students on current practices and introduce modern techniques essential for employment readiness.
 - b. Myotherapy Institute must demonstrate that sufficient equipment and learning stations are provided to allow each student adequate scheduled time for practice (*Section II (A)(5)(c), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that although the school’s budget included designated funds for learning aids and materials, Myotherapy Institute must submit a purchase order to the home office in Texas whenever such items—such as massage oil—are required. This process frequently leads to significant delays. Interviews with students indicated that, in some cases, these delays resulted in students purchasing materials independently. Additionally, campus leadership appeared to lack authority to acquire essential learning materials, which further amplifies the impact of delays from the corporate office.

In response to the OER, Myotherapy Institute submitted its “Learning Aids Access and Security Policy – On-Campus and Online” as the school’s policies and procedures related to securing learning aids. The school conducted an assessment of didactic materials and stated:

Since the on-site evaluation, instructor [REDACTED] was tasked with finding updated materials for classroom instruction. In the review of materials, [REDACTED] found a number of updated videos to replace some of the current videos which were outdated (Id.).

Although Myotherapy Institute included a purchase requisition form for six DVDs, there is no indication if the school or ownership approved the order. In addition, the school did not provide information as to how the school deemed these materials appropriate and how the school integrated them into the curriculum. Further, the policy and narrative do not show who approves any purchase orders of instructional materials. Accordingly, the Commission has questions surrounding the school’s process of assessing and procuring learning aids and directs Myotherapy Institute to submit the following:

- a. An explanation as to how the school’s instructional materials are 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;

- b. An explanation regarding the individual(s) who approve the purchase of instructional materials, the timelines surrounding requests to procure these materials, and how the materials are incorporated into the program curriculum;
 - c. Documentation of any approvals to update didactic materials since the on-site evaluation; and
 - d. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
9. Myotherapy Institute must demonstrate that all advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions with respect to the school, its location, its name, its personnel, its training, its services, or its accredited status (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*). In response to the December 17, 2025 OER, the school provided corrective actions taken, such as updating text on the school’s website, in response to the findings of the on-site evaluation team. At the May 2026 meeting, the Commission noted a banner on Myotherapy Institute’s website stating, “Master the Art of Therapeutic Massage and Muscle Therapy with Expert Training and Hands-On Experience.” While the Commission questions the use of the word expert, subsequent to the Commission’s review of the school’s response to the OER, it appears that the school removed this statement from its website. As such, the Commission directs Myotherapy Institute to provide clarification to confirm that this statement no longer appears on the school’s website. If this statement remains on the website, the school must provide evidence, including external sources, to support and show that the phrase and claim are in fact truthful and accurate.
10. Myotherapy Institute must demonstrate that the school furnishes a copy of the enrollment agreement to the applicant at the time the applicant signs and furnishes a final copy of the enrollment agreement signed by both parties to the student prior to the student starting class (*Section IV (C)(2)(d), Substantive Standards, Standards of Accreditation*). The Enrollment Agreement Checklist Item #19 requires schools to include the name, title, and signature of the appropriate accepting school official (excluding those involved in recruiting and admissions activities) and the acceptance date, constituting admission into the school. While the on-site evaluation team found that CEO [REDACTED] signs the enrollment agreements, the enrollment agreements did not include a field for [REDACTED]’s title. As such, the team noted that the enrollment agreement does not make clear that the school official counter-signing the document constitutes admission of the applicant into the school.

In response to the December 17, 2025 OER, Myotherapy Institute included the school’s enrollment agreement cross-referenced to ACCSC’s Enrollment Agreement Checklist along with six completed enrollments agreements: three from October 2025 utilizing the old version of the enrollment agreement and three for the January 2026 start using the new enrollment agreement. Although all of the enrollment agreements now show the name and title of the accepting school official, the Commission found that the school completed the enrollment agreements for two of six students signed by both parties after the students started class as follows:

Student Initials	Program Start Date	Enrollment Agreement Signed by Student Date	Enrollment Agreement Signed by School Date
HD	January 5, 2026	January 3, 2026	January 15, 2026
DW	October 19, 2026	October 18, 2025	October 23, 2025

Based on the foregoing, the Commission determined that additional information is necessary and directs Myotherapy Institute to submit the following:

- a. A list of the 10 most recently enrolled students since the school’s response to the December 17, 2025 OER in the following format:

Student ID#	Program	Start Date	Date Enrollment Agreement Signed by Student	Date Enrollment Agreement Signed by Accepting School Official	Name of Accepting School Official

- b. Copies of executed enrollment agreements for each of the students listed in item (a.) above;⁵ and
 c. Any additional information that Myotherapy Institute believes will show the school’s compliance with accrediting standards in this regard.

11. Myotherapy Institute must demonstrate that the school has and applies a fair and equitable refund policy and that the school issues refunds in accordance with that published policy (*Section I (D)(3), Substantive Standards, Standards of Accreditation*). As stated in the January 21, 2025 Warning letter, the Commission found that the school did not provide documentation of any refunds post the change of ownership and control. While the Commission acknowledged the new policies, procedures, and training in place to process refunds and the change in the financial aid processor, the Commission found that Myotherapy Institute did not provide updated documentation to show that the school made required refunds in accordance with the school’s refund policy. In response to the January 21, 2025 Warning, Myotherapy Institute indicated that there were no student withdrawals from October 1, 2024 through March 1, 2025. In addition, in reviewing the school’s refund policy, the Commission sought clarification about the school’s use of “termination” and “date of determination.” Overall, the Commission found that Myotherapy Institute had not had the opportunity to demonstrate that the school processes refunds in accordance with its policies and determined that additional information was needed to ensure that the school has and applies a fair and equitable refund policy.

Per the December 17, 2025 OER, the on-site evaluation team noted that Myotherapy Institute did not have any refunds and as such did not review this area. In response to the OER, the school stated that there were no student withdrawals since the October 2025 on-site evaluation. With no student refunds since the change of ownership, the Commission again found that Myotherapy Institute has not had the opportunity to demonstrate that the school processes refunds in accordance with its policies

Based on the foregoing, the Commission directs Myotherapy Institute to submit the following:

- a. A copy of the school’s refund policy as published in the catalog and enrollment agreement.
 b. A list of the 5 most recently withdrawn students since the December 17, 2025 OER organized as follows:

Student ID#	Start Date	Refund Required (Y/N)	Last Date of Attendance	Date of Determination	Refund Due Date	Date Refund Paid	Refund Amount

- c. Refund information for the students listed in Chart (b.) above to include the enclosed the Refund Report Summary Sheet, Refund Report Worksheet, individual attendance records to include

⁵ Myotherapy Institute must ensure that any response, forms, or any documentation submitted to the Commission does not contain 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.). Specifically, several enrollment agreements in the school’s response to the OER include student social security numbers.

- documentation of approved leave of absences (as applicable), and copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student refunds;
- d. Student ledgers for each of the students noted above, demonstrating tuition charges applied, tuition funds paid, and refunds issued; and
 - e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards regarding refunds.
12. Myotherapy Institute must demonstrate that the school internally reviews and evaluates its recruiting policies and procedures and the performance of representatives involved in recruiting activities for compliance with accrediting standards and applicable law and regulation at least once annually and maintains documentation of the review and evaluation (*Section IV (A)(9), Substantive Standards, Standards of Accreditation*). Upon review of the school’s response to the January 21, 2025 Warning letter, the Commission found that Myotherapy Institute did not demonstrate sufficient separation between admissions responsibilities and enrollment actions, as the school identified [REDACTED] whose primary role involves admissions, as the designated staff person to sign enrollment agreements. As a result, the Commission directed the school to provide updated admissions policies and documentation for review during the Commission-Directed on-site evaluation. During the October 2025 evaluation, upon review of the school’s current student files, the team noted that [REDACTED] the owner of Graduate America, is now the accepting school official, and the school’s processes allows for adequate separation of duties. However, the on-site evaluation team noted that [REDACTED] had not been affiliated with the institution long enough to warrant an annual review at the time of the visit.

In response to the December 17, 2025 OER, Myotherapy Institute indicated that the school completed a formal review of recruitment policies, procedures, and personnel performance. The school described corrective action taken, the review process summary, and how the school retains necessary documentation. In addition, the school included a blank copy of its “Recruiting Annual Review Report” and “Recruiting Policy Review Checklist” and a completed Recruiter Performance Evaluation Form for [REDACTED] which seems to differ from the Recruiting Annual Review Report. In addition, while the evaluation form is signed by the CEO, the form is not signed by the employee, [REDACTED]. In addition, the organization chart shows [REDACTED] as the school’s Enrollment & Admissions Specialist, though it is unclear when this individual started this position and if an annual review is required.

Accordingly, the Commission directs Myotherapy Institute to submit the following:

- a. A list of personnel involved in recruitment activities to include the employment start date in the position;
 - b. A copy of the most recent performance evaluation signed by the employer and employee for compliance with accrediting standards and applicable laws and regulations for each individual listed above, if applicable; and
 - c. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
13. Myotherapy Institute must demonstrate that the school is in compliance with federal government requirements (*Section I (D)(3), Rules of Process and Procedures, Standards of Accreditation*). At the August 2025 meeting, ACCSC considered the school’s Heightened Cash Monitoring 2 status with the Department of Education and voted to defer action in order for the school to submit additional

information. In response to the October 22, 2025 Commission letter, the school indicated that “No additional findings, sanctions, or adverse actions have been issued since the Department’s May 28, 2025 notice” (November 25, 2025 Myotherapy Institute Response, pg. 8). Myotherapy Institute insists that the school is financially stable and that there have been no delays or interruptions of financial transactions with the Department. The school requested removal of HCM2 from the Department; however, as of the date of the response, the school remains on HCM2. Accordingly, the Commission directs Myotherapy Institute to provide the following:

- a. An update as to the school’s status with the Department;
- b. A copy of any correspondence between the school and the Department since November 25, 2025; and
- c. Any other information or documentation that the school believes will assist the Commission with determining the school’s compliance with accrediting standards in this regard.

PROBATION REQUIREMENTS:

In cases where the Commission has made a determination that a school is out of compliance with one or more accreditation standards or other requirements, the Commission will place a school on Probation. A school subject to a Probation must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation (Section VII (L)(6) Rules of Process and Procedure, Standards of Accreditation)*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the reason for the Probation is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies.

Teach-Out Plan

The Commission directs the school to provide an Institutional Teach-Out Plan Approval Form,⁶ **which must be submitted as part of the response for the items listed above (Section IV (F)(1)(d) Rules of Process and Procedure, Standards of Accreditation)**. The teach-out plan must contemplate the loss of accreditation and concordant loss of state or federal funding.

Timeline and Maximum Timeframe to Achieve Compliance:

According to *Section VII (N), Rules of Process and Procedures, Standards of Accreditation*, when the Commission has found an area in which a school is out of compliance with accreditation standards or

⁶ <https://www.accsc.org/forms-and-reports/>

requirements, the Commission will provide the institution with a timeline notification for coming into compliance that is reasonable based on the nature of the finding, the current period of review, the school's stated mission, and the educational objectives of the institution. The Commission intends to review this matter again at its August 2026 meeting in order to give the school a timely opportunity to demonstrate compliance with the findings cited herein. However, given the nature of the findings the maximum timeframe allowed for Myotherapy Institute to achieve compliance begins as of the date of this letter and ends on **June 30, 2027** (which includes time for the Commission's review and determination).

Please be advised that the Commission is not required to allow the maximum time frame to remedy noncompliance in all instances. The Commission may take an adverse action at any time prior to the end of the maximum timeframe established above, including taking immediate action at the August 2026 meeting or any other interim meeting within the established timeline. Regardless, if the school does not demonstrate compliance within this timeframe, the Commission will take action to withdraw the school's accreditation.

Notification to Students:

Within **seven days** of receipt of the Probation notification and for the duration of that action, the school must:

- a. Inform current and prospective students in writing that the school has been placed/continued on Probation and provide such notice on the school's website;
- b. Provide a summary that accurately describes the reasons for the Probation; and
- c. Provide the uniform resource locator (URL) where that action can be obtained from the Commission's website.

The school must **within seven days** inform current and prospective students in writing that the school has been placed on Probation, provide a summary of the reasons for the Probation, and indicate where that action can be obtained from the Commission's website. (*Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*). **Within 10 days the school must upload a copy of the notice provided to students to ACCSC's College 360 Database (directions below).**

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.

Myotherapy Institute 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.⁷ 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.

⁷ ACCSC has resources for submitting a well-documented and organized response for Commission consideration. As a reminder, *Section I (H)(1) Rules of Process and Procedure, Standards of Accreditation* states that all submissions and notifications must be organized as required by the *ACCSC Instructions for Electronic Submission*.

Myotherapy Institute 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.

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.

In summary, the school's response is to include the following:

- **A copy of the notice provided to students of this Probation to ACCSC's College 360 School Submission Portal uploaded no later than June 8, 2026;**
- **The school's response to the substantive items included in this letter along with a signed certification attesting to the accuracy of the information uploaded to the College360 School Submission Portal no later than July 15, 2026;**
- **An Institutional Teach-Out Plan Approval Form submitted as part of the response due July 15, 2026.**

If the response, the required \$1000 processing fee, and the certification attesting to the accuracy of the information is not received in the Commission's office **on or before July 15, 2026**, 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 me at [REDACTED]

Sincerely,

[REDACTED]

Executive Director

c: [REDACTED]