ACCSC
Accrediting Commission of Career Schools and Colleges

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November 4, 2026

ELECTRONIC DELIVERY
[redacted]

[redacted]
Director
Myotherapy Institute
245 South 84th Street
Lincoln, Nebraska 68510

School #M070147
Probation

Dear [redacted]:

At the August 2026 meeting, the Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") considered its previous decision to place Myotherapy Institute located in Lincoln Nebraska on Probation. Upon review of the May 29, 2026 Commission letter and the school's response, the Commission voted to continue the school on Probation with a subsequent review scheduled for ACCSC's February 2027 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 On-site Evaluation Report ("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.
- At the February 2026 meeting, ACCSC considered its previous decision to continue Myotherapy Institute 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 OER related to the Commission Directed Announced Visit, 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.

Area of Non-Compliance with Accrediting Standards

1. Myotherapy Institute 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 (*Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation*), 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]

[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*)

Myotherapy Institute delivers courses through asynchronous online instruction for both clock-hour non-degree students and academic associate degree students. As noted in the December 17, 2025 OER, faculty track attendance for both programs based on student participation in discussions and completion of assignments. 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, Myotherapy Institute indicated that the school utilizes the learning management system Canvas to administer the online, asynchronous courses. While the school also provided attendance reports for one student, the Commission found that the student did not complete 100% attendance for all classes, which did not match the school's narrative nor the practice of awarding clock hours in an asynchronous program. Overall, the Commission found that it was unclear how the school monitored attendance on an hour-by-hour basis, including the make-up hours for tardiness and absences, to ensure that students complete the required hours for the Massage Therapy (Diploma) program. Additionally, the Commission found that the school failed to show that students achieved 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.

In response to the Commission's May 29, 2026 Probation letter, Myotherapy Institute provided the following narrative regarding the description of and justification for the school's methods of delivering a clock-hour only asynchronous, distance education course/program:

> *Effective June 1, 2026, the School revised its attendance process to separate academic completion from verified clock-hour attendance. Completion of an assignment, quiz, discussion, module, or other academic activity does not, by itself, result in the award of scheduled clock hours. A Canvas login alone and unsupported idle time are not counted as attendance.*
>
> *For asynchronous instruction, faculty review the available Canvas and institutional records connected to the required instructional activities. Where the records do not support all required scheduled instructional time, the unsupported time is recorded as deficient. The student must complete the remaining required instructional time through an approved make-up activity or scheduled instructional session that can be documented.*
>
> *Until the School receives approval to convert the Massage Therapy Diploma program from clock hours to quarter credit hours, the School will not use completion of asynchronous academic work alone as proof that a student completed required clock hours* (July 12, 2026 Myotherapy Institute response, page 11).

Myotherapy Institute also included:

- A copy of its revised "Asynchronous Clock-Hour Distance Education and Attendance Policy";
- An explanation as to how the school tracks attendance in the Massage Therapy (Diploma) program;
- The school's policy related to excused hours and how students make up these hours; and
- A list of all students enrolled in the Massage Therapy (Diploma) program for the period of January 1, 2026 through June 30, 2026 with attendance logs and grade reports for each student.

In reviewing this documentation, the Commission found that the attendance logs and grade reports submitted do not include any information for June 2026 despite the school showing seven students enrolled in this program during this time. Therefore, the school did not provide evidence of the implementation of the Asynchronous Clock-Hour Distance Education and Attendance Policy revised as of June 1, 2026 or the utilization of the new "Asynchronous Attendance Verification and

Reconciliation Form," "Make-Up Hours Request, Completion, and Faculty Verification Form," or "Final Course / Program Clock-Hour Completion Review" form.

From the records provided, there appear to be similar inconsistencies to those referenced in the May 29, 2026 Commission letter. Specifically, the grade reports show numerous instances of late submissions that do not seem to impact scores, and some assignments display the submission date while others do not. Additionally, attendance reports show students not completing 100% of course hours. For example:

- The attendance reports for [redacted] shows that this individual attended seven hours (11.66%) of the 60-hour Swedish Massage course and four hours (10%) of 40-hour Anatomy/Physio course. Then, the student completed 45 make-up hours, resulting in 52 total hours (86.67%) for the Swedish Massage course and 36 make-up hours, resulting in 36 total hours (90%) for the Anatomy/Physio course.
- [redacted] attended only 76.66% of the scheduled hours for the Hydrotherapy and Hot Stone course yet exceeded the 111.15 scheduled clock hours for the Massage Practicum course by five hours, resulting in the total percent attended (including make-up hours) of 104.34% for this course.
- The attendance report for [redacted] shows that this student completed all 74 scheduled hours for the Spa Treatments and Facial Massage course; however, the Outline of a Non-Degree Program form included in the response lists only a 50-hour Spa Treatments course. The same student's massage practice hour log shows client initials for some treatments but not others.

Overall, the records do not show cumulative grade and attendance, so it is unclear how the school ensures that students are meeting satisfaction academic progress ("SAP") in accordance with the school's policies and for the purposes of Title IV funding.

Please note that despite continuing Myotherapy Institute on Probation, the Commission determined that the school should be permitted to proceed with the Application for Clock to Credit Hour Conversation for the Massage Therapy (Diploma) program, which is scheduled for the Commission's review at the November 2026 meeting.

Based on the information provided, the Commission found that Myotherapy Institute again did not demonstrate how students complete the requisite number of hours in the asynchronous, clock-hour Massage Therapy (Diploma) program. The attendance logs and grade reports continue to show inconsistencies in students' abilities to meet the program's requirements, and although the school implemented a revised Asynchronous Clock-Hour Distance Education and Attendance Policy with new forms, the school did not submit documentation of implementation. Although the Application for Clock to Credit Hour Conversion may alleviate some of the Commission's concerns, if approved, Myotherapy Institute must 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 that the school establishes authentication policies and processes regarding student verification in a distance education course or program.

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

a. Any documentation between ACCSC and the school regarding the Application for Clock to Credit Hour Conversation for the Massage Therapy (Diploma) program since November 1, 2026;

b. A copy of the school's attendance policy to include any updates since the school's response to the Commission's May 29, 2026 letter;

c. A list of all students enrolled in Massage Therapy (Diploma) program from the period of July 1, 2026 through November 30, 2026;

d. Attendance logs and grade reports for each student included in (c.) above to include cumulative grade and attendance for each student; and

e. 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*).

As referenced in the December 17, 2025 OER, the on-site evaluation team identified numerous discrepancies based on the review of Myotherapy Institute's published catalog and course syllabi. Based on the differences in clock-hour and credit-hour allocations by course, the team could not verify the programs 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 OER, the school attributed the discrepancies in course hours and titles to the delay in approval of program modifications by ACCSC. Although Nebraska approved the modifications in June 2025, the school's Warning status prevented the Commission from processing the substantive changes at that time in accordance with *Section VII (K)(7), Rules of Process and Procedure, Standards of Accreditation*.

At the February 2026 meeting, the Commission reviewed transcripts submitted by recent graduates, three from the Massage Therapy (Diploma) program and one from the Massage Therapy (AAS) program. Based on the transcripts, the Commission found that the school did not offer the Massage Therapy (Diploma) program as approved by the Commission nor as approved by the Nebraska Department of Education. 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 appeared 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 contained several of the same courses with the identical course descriptions in the school's catalog. However, because the degree program contained outside work that the non-degree program did not, the courses were not equivalent and could not be measured the same way. Furthermore, the Commission noted several other discrepancies with how courses were listed in the school's syllabi, catalog, and program outlines

In response to the May 29, 2026 Commission letter, Myotherapy Institute acknowledged discrepancies and corrected the school's approach. Specifically, the school indicated that:

> *A course is now treated as shared between the two programs only when the course code, title, learning outcomes, instructional content, instructional hours, outside work requirements, assessments, and credit calculation are the same. When any of these elements differ, the course is separately identified and documented.*

> *The proposed curriculum establishes an aligned, stackable pathway in which courses designated as shared are equivalent across both programs. Additional AAS requirements are separately identified as degree-level coursework and are not represented as equivalent to Diploma coursework* (*Id*., pg. 16).

The school also submitted an Application for Clock to Credit Hour Conversation for the Massage Therapy (Diploma) program and an Application for a Substantive Program Modification for the Massage Therapy (AAS) program. In addition, Myotherapy Institute included 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. The school also provided a description of the corrective action taken by the school to ensure consistency in how the program is advertised, offered, and approved.

Based on the response, the Commission wants to ensure that the school's programs are approved by the appropriate Nebraska agencies with consistent clock and credit hours. As noted in item #1 above for the Application for Clock to Credit Hour Conversation, the Commission also determined that the school should be permitted to proceed with the Application for a Substantive Program Modification. The Commission will review both applications at the November 2026 meeting and will ensure that the school's programs meet Nebraska's requirements. Please note that part of the Application for a Substantive Program Modification includes a request to submit Program Advisory Committee ("PAC") minutes demonstrating review and comment on the proposed modification. Myotherapy Institute's response states that "[t]he proposed program modification was not presented to the Program Advisory Committee prior to submission of this application" (*Id*., pg. 333). The school will present the modification for review at the next PAC meeting scheduled for December 2026. (Please see item #5 in the additional areas of on-going concern section of this letter for further information.)

As part of the response, Myotherapy Institute included the program and course descriptions for the Massage Therapy (Diploma) and Massage Therapy (AAS) programs as published in school's catalog as well as copies of course syllabi. The Commission found that the information provided represents the current versions of the programs which the Commission found incorrect in the previous review. Accordingly, the Commission directs the school to submit this information for the programs as published in the school's catalog and syllabi if the Commission approves the modifications. If the Commission does not approve the modifications prior to the response to this letter, please include draft versions of the catalog and syllabi showing these potential changes.

Given that the program organization continues to show inconsistencies that may or may not be addressed with approved applications, the Commission directs Myotherapy Institute to submit the following:

a. 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 if the Commission approved the school's applications. If the Commission does not approve the applications by the response due date, submit draft program and course descriptions to reflect the proposed modifications;

b. A copy of each of the school's syllabi that shows the scope and sequence of the subject matter for each program and the clock hours/credit hours earned for each course if the Commission approved the school's applications. If the Commission does not approve the applications by the response due date, submit draft syllabi to reflect the proposed modifications;

c. A list of the five most recent graduates since the response to the May 29, 2026 Commission letter and transcripts for these individual; and

d. 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*), and

   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*).

   In response to the May 29, 2026 Commission letter, Myotherapy Institute submitted an organizational chart and a list of each operational area with the individual responsible for each area and their location. The school also provided Staff Personnel Reports for the school's management and administrative staff members and job descriptions with personnel qualifications for the individuals in the Chief Executive Officer; Dean of Academic Affairs; Director of Institutional Operations & Compliance; Director of Institutional Effectiveness; Admissions Coordinator; and School Director positions. While the school included job descriptions for the Student Accounts Coordinator and Enrollment Coordinator positions, the school did not submit documentation of qualifications for the individuals in these positions. In addition, the school lists [redacted] as Instructor / Externship Coordinator on the organizational chart but as the Student Spa Supervisor on the Staff Personnel Report.

   For the operational responsibilities on campus, the school's response shows [redacted] responsible for the following areas: billing campus support; financial aid campus support; providing LRS orientation / campus support; academic advising campus support; student services; student records - campus coordination; and career services / employment assistance. Although Myotherapy Institute has a small student population, the Commission continues to question the ability of one individual responsible for so many areas.

   Regarding financial aid administration, the school explained that Graduate America supports Myotherapy Institute, and a separate company, Portico, also provides financial aid support though Graduate America retains oversight and responsibility of Title IV financial aid. The school "formalized the revised financial aid support process to establish clearer direct student access to Portico financial aid support" effective June 1, 2026 (*Id*., pg. 27) and included a document with direct contact information for students with any financial aid questions. The document shows [redacted]. As noted in the May 29, 2026 Commission letter, student survey results show that financial aid remained a concern for at least three of the six students. In response to the letter, the school submitted results of a student satisfaction survey conducted in May 2026. All areas show student satisfaction over 90% with the exception of Financial Aid at 82.4%. As such, the Commission is interested in the status of the relationship between the school and Portico and student satisfaction related to financial aid based on the "Financial Aid Student Support and Escalation Procedure" agreement with Portico. Additionally, the school's Continuous Institutional Improvement Plan states "Financial aid services and processing are provided remotely through CampusIVY" (*Id*., pg. 552). As such, the Commission seeks clarification of the school's relationship with Portico and/or CampusIVY.

Based on the foregoing, the Commission requests clarification of several management positions referenced above and additional information about the School Director's responsibilities and directs Myotherapy Institute to submit the following:

a. An updated Organizational Chart listing all positions and names of personnel for each position;

b. A justification of the School Director's roles and responsibilities to include information regarding the support this individual receives both on-campus and from the corporate entity;

c. Clarification of the job title and responsibilities for [redacted] to include a Staff Personnel Report.[2] for this individual. If [redacted] is no longer at the school, provide information for the individual(s) in the position(s);

d. Documentation of qualifications for the individuals in the Student Accounts Coordinator and Enrollment Coordinator positions;

e. A narrative update regarding financial aid services and support available to students to include information about if the school has a contract with Portico, CampusIVY, or both companies;

f. Summary results of a student survey regarding financial aid 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; 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 its financial structure is sound with resources sufficient for the proper operation of the school and the discharge of obligations to students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). In addition, the school must be in compliance with all applicable federal government requirements (*Section I (D)(3), Rules of Process and Procedures, Standards of Accreditation*). Graduate America, Inc. d/b/a Graduate America College & d/b/a Myotherapy Institute & d/b/a Graduate America's (FKA Vocational Nursing Institute) fiscal year end December 31, 2025 and 2024 audited financial statements show the following:

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

As part of the Financial Report, Graduate America, Inc. disclosed the following:

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

[redacted] *As a result of the acquisition, the organization incurred increased payroll and operating expenses related to the integration of the institution, expansion of instructional and administrative staffing, enhancement of compliance functions, and other operational infrastructure necessary to support program growth.*

The financial statements are presented on a combined basis; therefore, [redacted] *Since the acquisition, the Vocational Nursing Institute has experienced significant enrollment growth during the current fiscal year, supporting increased revenue and strengthening the organization's long-term financial outlook* (July 22, 2026, ACCSC Financial Statement Analysis Worksheet, Summary Information).

In addition, Myotherapy Institute is currently on Heightened Cash Monitoring 2 ("HCM2") with the U.S. Department of Education ("the Department"). In response to the May 29, 2026 Commission letter, the school indicated that "Myotherapy Institute continues to operate under the Department's Heightened Cash Monitoring 2 procedures and has not received written notice removing the School from HCM2" (*Id*., pg. 52). At the Commission's request, Myotherapy Institute provided copies of correspondence between the school and the Department since November 25, 2025. As noted, the school has not received a response from the Department as of the last follow-up request for removal from HCM2 on December 19, 2025. The school continues to administer Title IV financial aid under the applicable HCM2 reimbursement and provided a copy of a notice of Approval of HCM2 Claim 12455 on April 10, 2026.

Based on the foregoing, the Commission is interested in ensuring that the school is operating in compliance with accreditation requirements for financial soundness and determined that additional monitoring of the school's financial position is warranted. As such, the Commission directs Myotherapy Institute to submit the following:

a. Myotherapy Institute's internally prepared financial statements for the 9-month period of January 1, 2026 through September 30, 2026, prepared in accordance with requirements set forth in ACCSC's *Instructions for the Preparation and Submission of Financial Statements and Related Information*;

b. An updated Management Discussion and Analysis narrative examining and explaining Myotherapy Institute's current financial condition;

c. Myotherapy Institute's full fiscal year 2026 budget with a budget-to-actual analysis for the 9-month period covering January 1, 2026 through September 30, 2026;

d. An update as to the school's status with the Department;

e. A copy of any correspondence between the school and the Department since April 10, 2026; and

f. Any other information or documentation that Myotherapy Institute believes will assist the Commission with reviewing the school's financial position.

3. 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 May 29, 2026 Commission letter, the school submitted a copy of its "Continuous Institutional Improvement Plan" last updated in July 2025 and listed improvement activities since the October 2025 ACCSC on-site evaluation including implementation of a Course Evaluation Rubric and a Faculty Evaluation

Rubric; offering targeted faculty development sessions; continuing review of student achievement, student services, instructional resources, and institutional operations; and developing student and faculty and student course-time validation tools. While Myotherapy Institute's documentation of implemented activities include completed faculty evaluations, the Commission found that the school submitted only a blank copy of a Course Evaluation Rubric. In addition, the school provided its "Student Achievement Improvement Plan Evaluation," but many of the due dates listed on this plan are from early 2025. Myotherapy Institute also included a blank Student and Faculty Hour Allocation Survey and a blank Course Learning Time Validation Report along with a Course Design and Allocation Matrix for the Swedish Massage and Anatomy & Physiology II courses though the verification status of the items on these course matrices show the verification status as proposed. Overall, the Commission found that Myotherapy Institute submitted some documentation of completed activities, such as finalized faculty worksheets for a faculty development presentation on "Effective Feedback in an Online Environment" and a receipt of DVD purchases, presumably for the school's Learning Resource System; however, many plans appear to be in development or not updated.

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

a. An updated copy of the school's Continuous Institutional Improvement Plan;

b. A description of any institutional assessment and improvement activities implemented since the school's response to the May 29, 2026 Commission letter;

c. Documentation of assessment and implementation activities since the May 29, 2026 Commission letter; and

d. Any additional information that the school believes will show that the school engages in significant and ongoing institutional assessment and improvement activities.

4. 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 May 29, 2026 Commission letter, the school reported the following student achievement rates using a July 2026 Report Date on the Graduation and Employment Chart and Licensure / Certification Examination Pass Rates Chart:

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	100%	55%	**50%**	70%	**50%**	70%

The reported employment and licensure rates for the Massage Therapy (Diploma) program fall below ACCSC's student achievement benchmark rates.[3] Myotherapy Institute also included a Graduation and Employment Chart with an October 2026 Report Date showing a graduation rate of 100% and an employment rate of 75%. While these rates meet ACCSC's benchmark rates, the Commission directs the school to provide summary information to support these rates as detailed below. In addition, the school submitted a Licensure Pass Rates Chart with a January 2027 Report Date showing a 67% licensure rate (2 graduates passed the exam / 3 graduates taking the exam) though the school believes that an additional graduate will pass the examination soon to increase the rate to 75%.

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

While Myotherapy Institute provided initiatives to improve student achievement rates including building relationships with employers and industry representatives and conducting an MBLEx Prep day session and offering an MBLEx Prep course, the Commission determined that additional information is warranted for the school the efficacy of its efforts. Accordingly, the Commission directs the school to submit the following:

a. A Graduation and Employment Chart for the Massage Therapy (Diploma) program using a **January 2027 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 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)	01/10/2025	12/15/2025	N/A
2	12346	Massage Therapy (Diploma)	01/10/2025	N/A	04/01/2025

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 field[4] (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					

and

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						

c. A Licensure/Certification Examination Pass Rates Chart for the Massage Therapy (Diploma) program using a **January 2027 Report Date**;

d. If applicable, for any program for which the reported rates of student graduation, graduate employment, or licensure pass rates do not meet ACCSC's benchmark rates, a description of the strategies being implemented to support student achievement rates; and

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

e. 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.

5. 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*). In its response, Myotherapy Institute submitted the school's "Graduate Employment Recording and Verification Policy" and blank copies of the school's Employment Verification and Self-Employment Verification forms. The school's policy related to self-employment states:

   A graduate who is self-employed may be recorded as employed only when the School obtains sufficient documentation demonstrating that the graduate is actively engaged in legitimate employment or business activity consistent with applicable reporting requirements.

   Supporting documentation may include, as applicable, business registration or licensing documentation, professional licensure or credential information, client or appointment documentation with confidential information appropriately protected, a business website or professional business profile, lease or booth rental documentation, independent contractor documentation, invoices, receipts, or other reliable evidence of active business activity.

   The School does not classify a graduate as self-employed solely because the graduate expresses an intention or plan to become self-employed (*Id*., pg. 585).

   As part of the response, the school submitted information for four graduates in which the school verified in-field employment since the school's response to the December 17, 2025 On-site Evaluation Report. Although Myotherapy Institute provided completed Self-Employment Verification forms for these four graduates which appear to meet the requirements of ACCSC's *Guidelines for Employment Classification*, the documentation does not meet the school's policy. Specifically, the response does not include supporting documentation in addition to the Self-Employment Verification form such as business registration, invoices, receipts, business websites, or lease or booth rental documentation.

   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 appliable;

   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 May 29, 2026 Commission letter, 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)	7/10/25	6/30/26	Jane's Spa, 123 Sample Way, Lincoln, NE 402.333.1234	7/5/26	10/1/26	Massage Therapist	Provide deep tissue massages to clients
2	12346	Massage Therapy (Diploma)	7/10/25	6/30/26	My Clinic, 456 Maple Dr. Lincoln, NE 402.444.5678	9/1/26	11/15/26	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 be useful to the Commission in making a determination regarding employment verification.

6. Myotherapy Institute must demonstrate that the school provides evidence that it gives consideration to Program Advisory Committee ("PAC") input. Evidence in this regard can take many forms, one such being the disclosure of the school's consideration recorded in PAC meeting minutes, whereby a school describes whether recommendations were implemented or not and explains the school's decisions (*Section II (A)(4)(b), Substantive Standards, Standards of Accreditation* and *Appendix III (3), Standards of Accreditation*). In response to May 29, 2026 Commission letter, Myotherapy Institute included a list of PAC members; minutes from a December 5, 2025 PAC meeting; a blank copy of a course evaluation rubric; and a resume for a PAC member with experience in the delivery of distance education programs. To show evidence that the school gives consideration to PAC recommendations, Myotherapy Institute's response states the following:

As courses are implemented for each new quarter, the addition of titles in the weekly modules are added to the courses to increase the accessibility of course content. These revisions are

ongoing, not all courses have been taught since the PAC meeting in December because of the way that courses are scheduled at Myotherapy Institute (*Id.*, pg. 45).

While Myotherapy Institute also provided documentation of course modules with headings, the Commission determined that additional information is needed to demonstrate that the school gives consideration to PAC input. Specifically, adding titles in weekly modules seems minimal given the breadth of topics discussed and reviewed at PAC meetings. As part of the response, the school indicated that the next PAC meeting is scheduled for December 12, 2026.

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

a. Minutes from the December 12, 2026 meeting or any other PAC meeting minutes since the school's response to the May 29, 2026 Commission letter. The minutes must include review and comment on the school's modifications reflected in the Application for Clock to Credit Hour Conversation for the Massage Therapy (Diploma) program and Application for a Substantive Program Modification for the Massage Therapy (AAS) program;

b. Evidence to show that the school gives consideration to the recommendations of the PAC; and

c. Any additional information that the school believes will assist the Commission in reviewing this area.

7. 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*). In response to the May 29, 2026 Commission letter, Myotherapy Institute submitted an explanation as to how the school's instructional materials are commensurate with the level of education provided. Specifically, the school described the review of items including textbooks, instructional videos, equipment, and supplies by faculty, campus administration, and the Program Advisory Committee and provided a link of a sample instructional video developed by the institution. Regarding the individual who approves the purchase of instructional materials, Myotherapy Institute indicated that "[t]he ultimate authority for approving the purchase of instructional materials rests with the school's owner and President, Malcolm Allen" (*Id*., pg. 47). The school included an approved January 15, 2026 purchase order request for DVDs. The Commission found that the school did not provide information regarding the timelines surrounding requests to procure these materials, how these materials are incorporated into the program curriculum, or evidence of evaluation or review of the appropriateness of these materials.

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

   a. An explanation regarding the timelines surrounding requests to procure and purchase instructional materials and how the materials are incorporated into the program curriculum;

   b. Documentation of any approvals to update didactic materials since the January 15, 2026 purchase referenced above to include evidence of the evaluation and review of the appropriateness of the materials; and

   c. Any additional information that the school believes will assist the Commission in reviewing this area.

8. 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*).

The school's response to the May 29, 2026 Commission letter indicated that the language referenced in this letter was removed. The Commission also reviewed the school's website (https://myotherapy.edu) and noted the following statements:

- "Nebraska's Premier Massage Therapy School"
- "Your healing career starts here. ACCSC-accredited degree and diploma programs preparing graduates for immediate licensure and rewarding careers in healthcare and wellness."
- "Your Path to Professional Licensure."
- "Title IV Approved."

The Commission found that the school did not justify the claim that Myotherapy Institute is "Nebraska's Premier Massage Therapy School." In addition, ACCSC accredits institutions and not individual programs. Please note that all advertising and promotional materials must clearly indicate that education, and not licensure or employment, is being offered. Finally, "Title IV" approved is not an appropriate statement. Typically, institutions use "financial aid available to those who qualify" or text substantially similar.

As such, the Commission directs Myotherapy Institute to provide information about the status of the four statements appearing on the school's website. For example, this may include a justification of the school's statement that Myotherapy Institute is "Nebraska's Premier Massage Therapy School," or evidence that the school removed this claim.

9. 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 multiple Commission letters and the December 17, 2025 On-site Evaluation Report, Myotherapy Institute did not have any refunds since the change of ownership and control.

   In response to the May 29, 2026 Commission letter, the school reported two student withdrawals since the OER. Per the school's published policy, student #600 was not due a refund, while the school was still in the process of providing a refund for student #563. Myotherapy Institute included the school's internal refund worksheet for student #563 showing 38.6% as the percentage of Title IV aid earned. The school also submitted a student ledger and attendance reports for student #563, showing that the student attended 43 hours out of 190 scheduled hours for 22.6% hours attended. Although this information appears to be internal refund documentation, the Commission is interested in learning how the school calculated the percentage of Title IV aid earned, and the total amount of the refund based on the hours scheduled and attended.

   As part of the response, Myotherapy Institute also submitted its Refund and Cancellation Policy though not as stated in both the catalog and enrollment agreement as requested. In reviewing this policy, the Commission noted item #8 titled Institutional Refund Calculation as follows:

   a. *For students who withdraw or are dismissed after classes begin:*
      i. *Up to 50% of the program scheduled: The percentage of tuition retained will equal the percentage of the program scheduled.*
      ii. *More than 50% of the program scheduled: The full contract price will be charged, and no tuition refund will be made.*

b. Students remain responsible only for any unpaid balance of tuition and fees earned under this calculation.

The Commission is interested in clarification regarding the definition of "program scheduled" in the refund policy (for example, does program scheduled refer to an amount of time or clock/credit hours?). In addition, as noted in item #1 above, with Portico and/or CampusIVY having a role in financial aid services, the Commission is interested in learning if either company assists with the processing of refunds.

Based on the foregoing, the Commission remains interested in the school's ability to process refunds in accordance with its policies and 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. An explanation of program scheduled as it relates to the school's refund policy;

c. A list of the 5 most recently withdrawn students since the December 17, 2025 OER, including student #563 but not including student #600, 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

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

e. Student ledgers for each of the students noted above, demonstrating tuition charges applied, tuition funds paid, and refunds issued; and

f. Any additional information that the school believes will assist the Commission in reviewing the school's processing and paying of refunds.

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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 reasons 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:

In response to the May 29, 2026 Commission letter, Myotherapy Institute submitted an Institutional Teach-Out Plan Approval Form as directed. In reviewing the form, the Commission found that the plan is insufficient in conducting planning in the event that the school closes due to a loss of accreditation. Specifically, question #8 asks the school to submit a plan to provide all potentially eligible students with information about how to obtain a closed school loan discharge and, if applicable, information on State refund policies. In its response, the school states, "Myotherapy Institute has no plans to close, therefore students are not eligible to obtain a closed school loan discharge at this time" (*Id*., pg. 954). Although the school does not intend to close, the Commission directs Myotherapy Institute to submit **a plan** to provide all potentially eligible students with information about how to obtain a closed school loan discharge and, if applicable, information on State refund policies.

In addition, question #7 on the form asks the school to provide an explanation, accompanied by supporting documentation and timelines, as to how the school will notify students as part of this teach-out plan. Item #7a directs the school to submit a copy of all notifications from the school related to the school's closure or to teach-out options in order for the Commission to ensure the information accurately represents students' ability to transfer credits. In its response, Myotherapy Institute states "The school has made no communications to students regarding the school's closure because the school has no plans to close" (*Id*., pg. 953). Although the school accurately replied to this question since the form asks the school to provide a copy of all notifications to students, the Commission directs the school to provide **a plan or a draft notification** for item #7 in response to this letter.

In the event of a school closure, the school provided a list of other institutions that offer similar programs and that the school could potentially enter into a teach-out agreement. For the Massage Therapy (Diploma) program, the list includes Omaha School of Massage Therapy, Essential Elements Institute of Massage Therapy, and Midwest School of Massage. It does not appear that these institutions are accredited, making it difficult for students receiving Title IV to transfer to these schools. In addition, for the Massage Therapy (AAS) program, the school lists an institution in New York and a second institution in Maryland as possible schools that would accept students as part of a teach-out agreement. Although Myotherapy Institute indicated that there are no other Nebraska schools that offer an Associate's degree in Massage Therapy, the proximity of these schools from Lincoln seems prohibitive for students.

Accordingly the Commission directs the school to provide a revised Institutional Teach-Out Plan Approval Form,[5] 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.

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 requirements, the Commission will provide the institution with a written timeline as set forth in the Commission's 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.

[5] https://www.accsc.org/forms-and-reports/

Given the nature of the findings, the maximum timeframe allowed for Myotherapy Institute to achieve compliance began on May 29, 2026 and ends on **June 30, 2027**. If the school does not demonstrate compliance by this date, the Commission may take action to withdraw the school's accreditation. Please also be advised that the Commission is not required to allow the maximum time frame to remedy noncompliance in all instances and may establish shorter time frames as deemed appropriate, including taking immediate adverse action.

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.

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.

The school must provide a response to this letter that provides the information requested along with any additional information that the school believes is supportive.[6] 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.

The school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission and uploaded directly to ACCSC's College 360 School Submission Portal. The ACCSC College 360 School Submission Portal can be accessed by clicking here.[7] 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 must include:

- **A copy of the notice of this Probation provided to students, uploaded to ACCSC's College 360 School Submission Portal no later than November 14, 2026;**

[6] ACCSC has resources available on its website 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***.

[7] Please note that the password utilized by the institution to access the School Submission Portal is the same used to access the Annual Report Portal of College 360. Password requests to access College 360 may only be made by the school director.

- **A response to each substantive item included in this letter and minimally all information requested by the Commission, uploaded to ACCSC's College 360 School Submission Portal no later than December 18, 2026;**
- **A revised Institutional Teach Out Plan Approval Form, uploaded to ACCSC's College 360 School Submission Portal no later than December 18, 2026;**
- **A signed certification attesting to the accuracy of the information presented in response to this letter (including the notice of Probation provided to students and the teach-out plan); and**
- **A $1,250 Probation Processing Fee**

If the school fails to meet the response requirements as set forth herein and/or fails to provide the materials by the required due dates, the Commission will consider further appropriate action which includes withdrawal of the school's accreditation.

For further assistance or additional information, please contact me at [redacted]

Sincerely,

[redacted]

Executive Director

c: Nebraska Coordinating Commission for Postsecondary Education
[redacted]

Nebraska Office of Accreditation, Certification, & Approval
[redacted]

U.S. Department of Education
[redacted]

Encls.: ACCSC Refund Report Summary Sheet
ACCSC Refund Report Worksheet

ACCSC REFUND REPORT SUMMARY SHEET

School Name:

School Number:

Refund Report Date Range:

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

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

REFUND REPORT WORKSHEET

A separate worksheet must be completed for <u>each</u> refund made within the time period specified by the Commission.

Name of Student: _____ Date of Enrollment: _____

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

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

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

Attach to the school's submission:

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

❒ The Refund Report Summary Sheet for all refunds included in this report.

Attach to this worksheet:

❒ Copy of the calculation sheet(s) showing how the refund was calculated,

❒ Copy of the front and the back of the refund check(s) or electronic transmission document(s).

THE REFUND REPORT WORKSHEET GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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