



Accrediting Commission of Career Schools and Colleges

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December 9, 2022

**ELECTRONIC DELIVERY**

██████████  
██████████  
Michigan Barber School  
8988-90 Grand River Ave.  
Detroit, Michigan 48204-2244

*School #M055562*  
*Warning*

Dear ██████████

At the November 2022 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to place Michigan Barber School (“MBS”) located in Detroit, Michigan on Warning in relation to the school’s Application for Renewal of Accreditation. Upon review of the June 2, 2022 Warning letter and the school’s response, the Commission voted to continue MBS on **Warning** with a subsequent review to be conducted in conjunction with the Corresponding On-Site Evaluation (“COSE”) required as part of the school’s renewal of accreditation application. The reasons for the Commission’s decision and the response requirements to the on-site evaluation team are set forth below.

#### **History of the Commissions Review**

- At the November 2014 meeting, the Commission voted to grant MBS renewal of accreditation for a period of four (4) years and to place the school on Outcomes Reporting for the 16-month and 18-month Barber Styling (Certificate) programs and on Financial and Program Advisory Committee (“PAC”) Reporting (see the Commission’s letter, dated December 10, 2014).
- At the March 2016 meeting, the Commission voted to continue MBS on Outcomes Reporting for the 16-month and 18-month Barber/Styling (Certificate) programs and to accept the PAC Report (see the Commission’s letter, dated May 24, 2016).
- At the November 2017 meeting, the Commission voted to defer final action on MBS’s Application for Renewal of Accreditation and to continue MBS on Outcomes Reporting for the 15-month, 16-month, and 18-month Barber/Styling (Certificate) program (see the Commission’s letter, dated December 7, 2017).
- At the May 2018 meeting, the Commission voted to grant MBS renewal of accreditation for four (4) years going forward from October 2016 and to continue MBS on Outcomes Reporting for the 15-month, 16-month, and 18-month Barber/Styling (Certificate) programs. The Commission also voted to place the school on Licensure Reporting (see the Commission’s letter, dated June 5, 2018).
- At the November 2018 meeting, the Commission voted to continue MBS on Outcomes Reporting for the 15-month and 18-month Barber/Styling (Certificate) programs and to continue the school on Licensure Reporting (see the Commission’s letter, dated December 5, 2018).
- At the November 2019 meeting, the Commission voted to continue the school on Outcomes Reporting for below-benchmark rates of student graduation in the 15- and 18-month Barber/Styling programs. Because the school was in the Renewal of Accreditation process, the Commission directed MBS to provide the on-site evaluation team with updated documentation relative to student achievement (see the Commission’s letter, dated January 17, 2020).
- The June 7, 2021 On-site Evaluation Report (Virtual Visit) raised a question with regard to below-benchmark rates of student graduation from the 15- and 18-month Barber/Styling program.

- At the August 2021 meeting, the Commission highlighted the below-benchmark student achievement rates in the 15- and 18-month Barber/Styling programs and noted that while the COVID-19 pandemic impacted the school's rates of student achievement, the below-benchmark rates pre-dated the pandemic, and thus directed the school to engage in a more thorough assessment of the causes of low student achievement. As such, the Commission voted to defer final action on MBS's Application for Renewal of Accreditation and Outcomes Report (see the Commission's letter, dated September 15, 2021).
- At the February 2022 meeting, the Commission reviewed the school's updated student achievement data, and found that the school, using a December 2021 Report Date on the Graduation and Employment Charts, reported graduation and graduate employment rates that fell below benchmark. Additionally, the Commission noted that while the school's narrative outlined external factors impacting student achievement, the response lacked specificity with regard to the impact of those factors, did not address how those factors impact student achievement, and did not support the school's assertions with sufficient documentation. As such, the Commission voted to place the school on Warning (see the Commission's Warning letter, dated June 2, 2022).

#### **BASIS FOR THE COMMISSION'S CONTINUED WARNING ACTION**

As noted in the history outlined above, MBS has reported below-benchmark rates of student achievement for a prolonged period. Historically, the school has demonstrated that external factors have impacted the school's ability to demonstrate graduation and graduate employment rates that met ACCSC's benchmarks, and after consideration of the challenges regularly faced by the school, the Commission granted MBS renewal of accreditation. In considering the school's most recent Application for Renewal of Accreditation and the significant history of below-benchmark rates, the Commission noted that identifying, acknowledging, and communicating the barriers to the population in the Detroit Metro area and Wayne County alone does not demonstrate sufficient attention and efforts regarding student achievement at MBS. That is to say, given the school's experience over many years, the Commission is interested in what the school has learned and what improvement strategies are in place to help mitigate or even overcome some of those barriers to success. As such, the Commission, as noted above, directs the school to assess, continuously and comprehensively, those external factors acting as barriers and to allow the assessment to guide the school's plan to alleviate or at least attempt to improve the ongoing difficulties with achieving student achievement rates that meet or exceed ACCSC's minimum benchmarks.

In the June 2, 2022 Warning letter, the Commission recognized that the school identified four areas that affected student achievement: admissions requirements, student demographics, teaching methods/transition to distance education, and learning methods. The Commission's letter summarizes the specific challenges outlined by the school facing the population of Detroit and Wayne County, such as the low literacy rate in Wayne County, basic needs insecurity, poverty, housing instability, food insecurity, transportation challenges, and online learning difficulties related to physical and mental health challenges. The Commission noted that while the school posited that the aforementioned challenges significantly influence student achievement, the school's response does not make an adequate "demonstration regarding the impact of these factors on the successful student achievement of education objectives" (ACCSC June 2, 2022 Warning Letter, page 6). The Commission understands that those factors and barriers may exist, but the school has not shown the actual impact of those factors on the school's student achievement outcomes. Additionally, the Commission's letter summarizes the school's response, which puts forth a mitigation plan, laying out four areas of focus to bolster student achievement: "(1) an increased focus on students throughout their matriculation, (2) solicitation of direct student feedback, (3) new student orientation, and (4) academic advising" (page 6 of 12). While the Commission acknowledged that "to some extent, external factors are beyond the school's control," the Commission also noted that the school could take specific steps to reduce

the impact of these external factors on the MBS student population. Upon consideration, the Commission gleaned that the school's response outlines the difficulties faced by the general population of the city of Detroit and Wayne County but did not demonstrate that MBS had engaged in meaningful assessment to identify the specific reasons why MBS students fail to complete the school's program.

Additionally, the school's response identifies the school's open admissions policy and student demographics as contributing factors to low student achievement, noting specifically that many students "may lack the educational readiness...and may experience difficulties adjusting to both academic and non-academic rigors" and "are largely first-generation college students and many are students for whom enrollment in MBS represents their first time in a higher education environment" (ACCSC, page 7). The Commission reminded the school that pursuant to *Section V (A)(1), Substantive Standards, Standards of Accreditation*, the school must "develop admissions criteria that are design to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered," and that *Section VI (A)(1), Substantive Standards, Standards of Accreditation* requires the school to provide adequate resources and student services to address the needs of MBS's student population and to support student performance. As the school's mission directs the school to keep the admissions criteria open, the Commission expects that the school will be able to support the educational and other needs of the student population it intends to serve.

Finally, the June 2, 2022 Warning letter notes that the school outlined the transition to distance education and the effects of the COVID-19 pandemic as having a significant impact on student achievement. The Commission acknowledged the steps the school had taken to ease the transition to the online environment and encouraged the school to consider additional resources and pathways to support online students. The Commission also expressed interest in how the school intends to bolster student achievement in light of the effects of the pandemic.

Overall, the Commission determined in the June 2, 2022 Warning letter that the school's response appeared to demonstrate a disconnect between an understanding of the factors contributing to low student achievement rates and the actions the school could take to address those challenges directly. Thus, the school's response did not sufficiently demonstrate that external or mitigating factors reasonably related to student achievement adversely impact the school's ability to meet the Commission's established benchmark rates (*Section VII (B)(1)(b)(iv), Substantive Standards, Standards of Accreditation*). As such, the Commission voted to place the school on Warning and directed the school to provide in response data regarding student withdrawals; an assessment of factors (i.e. admissions criteria/educational readiness, student demographics, transition to online delivery, student expectations regarding theory, socioeconomic factors, and the pandemic); and updated Graduation and Employment Charts and summary data. The Commission also directed MBS to demonstrate how the school discloses the graduation and graduate employment rates for each program and to provide copies of the most recent disclosures.

#### **November 2022 Review and Action:**

At the November 2022 meeting, the Commission considered its previous decision to place MBS on Warning in relation to the school's Application for Renewal of Accreditation. Upon review of the June 2, 2022 Warning letter and the school's response, the Commission has made the determinations set forth below and has set forth requirements for the school to complete for the review of the visiting team tasked with completing the school's Corresponding On-Site Evaluation.

1. Michigan Barber School must demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). At the November 2022 meeting, the Commission considered the current rates of student achievement as well as the school’s history of student achievement rates, as outlined below.

	Graduation Rates*						Employment Rates					
	2017	2018	2019	2020	12/2021	7/2022	2017	2018	2019	2020	12/2021	7/2022
Barber/Styling												
15 months	26%	32%	28%	40%	24%	55%	100%	100%	100%	100%	33%	50%
18 months	51%	48%	33%	30%	41%	52%	55%	85%	86%	71%	44%	61%

While the Commission recognized that the graduation rates reported using a July 2022 Report Date have risen to meet ACCSC’s benchmark rates, the Commission expressed concern regarding the below-benchmark employment rates. Further, as described by MBS, the Commission noted the significant impact that the Covid-19 pandemic has had on the school’s graduation rates. The Commission remains interested in the effectiveness of the school’s efforts in bolstering student retention beyond the pandemic, as at the time of the most recent response, some remediation strategies had been newly adopted or not yet implemented. Additionally, the Commission reviewed the school’s records of initial employment supplied in the response to support the employment rates and found inconsistencies in the school’s documentation and questioned the appropriateness and sufficiency of some records as stated below.

During its reviews of MBS’s submissions at the August 2021, February 2022, and November 2022 meetings, the Commission noted the school’s history of below benchmark student achievement outcomes and raised questions about the external factors that might be impacting the school’s ability to demonstrate student success and the direct actions the school was taking to mitigate those factors and to bolster student achievement. In the June 2, 2022 Warning letter, the Commission directed MBS to conduct a study of the reasons for student withdrawals; to assess specific factors, identified by MBS in the previous response, that impede student success; and to detail the steps the school has taken to help reduce the impact of those factors on student achievement.

Assessment of the factors impacting student achievement and the school’s mitigation efforts

In response to the June 2, 2022 Warning letter, MBS provided a list of 71 withdrawn/terminated students and provided detail on the reason for withdrawal for 42 of those identified. In assessing the data for those 42 students, the school appeared to again rely heavily upon student demographic information, stating, “the institution found that the African American student makes up 92% of the MBS student withdrawal population.” The school’s response goes on to posit that the external factors impacting MBS’s student population, such as low literacy rates, poverty, housing insecurity, food insecurity, transportation issues, and online learning difficulties, create substantial challenges for the majority African American student population. The response also cites household income and Pell-grant eligibility data of the student population as an indication of economic challenges faced generally by the African American population of Wayne County and graduates of the metro Detroit high school system. The school’s response notes that the challenges faced by this demographic generally impact students at MBS and the school’s retention/graduation rates.

The school's response then focuses more internally, exploring the school's admissions criteria and educational readiness assessments of applicants. Specifically, the school noted that applicants generally overlook the requirements for classroom theory instruction, and instead perceive the Barber/Styling program as exclusively consisting of practical and hands-on instruction, which may contribute to unrealistic expectations for incoming students. To remedy this perception, the school has implemented processes wherein applicants receive an introduction to the theoretical coursework component and the field's requirements pertaining to theoretical subject matter through an entrance interview and discussions with faculty and staff during the tour. Additionally, the school's response notes the intention to implement an aptitude test, after enrollment, to assess general academic readiness and to evaluate the student's ability to succeed in an online environment, starting with the incoming October 2022 cohort. The response also outlines the school's introduction of MindTap into the admission's process, specifically requiring students to navigate "the MindTap course to ensure that they do not have recurring computer issues navigating the device or learning platform" (MBS September 14, 2022 Response, page 6). While the Commission recognizes the school's efforts to gather more information on applicants prior to matriculation, the Commission questioned the effectiveness of these efforts given that, at the time of the response, the school had not yet implemented these new protocols. The Commission also questioned how determining a student's aptitude after enrollment would demonstrate to the school that the student is qualified and likely to complete and benefit from the education and training provided by the school (*Section IV (A)(1), Substantive Standards, Standards of Accreditation*).

With regard to student demographics, the school's response outlined a commitment to the "Plan of Action to Increase Graduation Rates and Graduate Placement Rates ("MBS Action Plan")," which calls for an "an increased focus on students through their matriculation at the institution ("Students Come First"), increased personal and specific student services, better communication of the institution's overall services, and enhanced academic advising that emphasizes the theoretical component of the academic program" (MBS September 14, 2022 Response, page 6). The response continues to note that in an effort to address the difficulties faced by the school's general student population, the school has contracted with the MBS Referral Provider, who "has developed a community referral system consisting of licensed counselors, therapists, social workers, as well as service agencies, and resource persons." The school noted that the first counseling referral occurred on February 24, 2022, well outside of the cohorts represented in the July 2022 Graduation and Employment Charts and that, as of the writing of the school's response, ten students had sought out the MBS Referral Provider's services. As the Commission recognizes this resource and the school's efforts to provide services to its students, the Commission is interested in additional information to determine the effectiveness of this new resource on bolstering student retention as it becomes more fully implemented.

In discussing online education, the school reiterated its commitment to a hybrid modality, but recognized the need for additional on-ground opportunities and to stress continually the importance of the theoretical components of the program. The response outlines the steps the school has undertaken to support students in a hybrid structure, including allowing for more in-person instruction/ an extended hours schedule; conducting on-ground Board preparation classes; implementing weekly on-site instructional demonstrations; and providing students with the opportunity for additional "floor time." The school's response also addresses that incentives to focus on the theoretical component span of the student lifecycle, including increasing the time students participate in the initial theory component from 8 weeks to 10 weeks; withholding barbering tools until the successful completion of all theory examinations; and providing graduates who pass the Michigan State Barber Board Examination with an opportunity to celebrate their success on the school's social media platforms.

Finally, the school's response highlights the difficulties presented by the COVID-19 pandemic. Upon review of the Graduation and Employment Charts using a July 2022 Report Date and the supporting information, the Commission noted the significant number of students impacted by the pandemic who are classified as "Unavailable for Graduation" (i.e. 15 students of 43 starts in the 15-month Barber/Styling program and 23 students of 71 starts in the 18-month Barber/Styling program). The school's response notates the impacts causing students to withdraw, such as individual illness, illness of a family member, etc. However, the school's response focuses particularly on student mental health. The school noted that in an effort to combat the struggles faced by some students, such as loneliness and depression, the school has not only relied upon the MBS Referral Provider, but also has begun hosting special barbering demonstrations and extracurricular events, in an effort to provide students with an opportunity to connect with each other and their communities and to apply/demonstrate the skills they are learning in the program.

Based on the foregoing, the Commission found that the school has made progress in assessing the factors that are hampering the school's ability to demonstrate successful student achievement and has implemented efforts to mitigate those factors. However, given how recently the mitigation efforts have been implemented and to monitor the effectiveness of the initiatives outlined in the school's response, the Commission determined that additional information is necessary to show that the school is making every effort to support student success despite the circumstances in which the school operates.

#### July 2022 Student Achievement Review

Upon review of the submitted Graduation and Employment Charts using a July 2022 Report Date, the Commission noted that with the allowance of the "Unavailable for Graduation" classification for students impacted by the pandemic, the school's graduation rates meet benchmark. However, given the history of low rates, and to determine the effectiveness of the school's ongoing efforts, the Commission remains interested in the school's retention rates.

With regard to graduate employment, the Commission noted that rates for both the 15-month and 18-month Barber/Styling programs fell below benchmark. Additionally, upon review of the records of initial employment, the Commission noted that overall, the records did not consistently appear sufficient to meet the expectations of the *Standards of Accreditation*, specifically those outlined in *Appendix VII – Guidelines for Employment Classification*. In particular, the Commission noted thirteen records, which use a 30-day Employment Verification/Attestation Form, which does not make clear how the school representative, Cheresa Greenwood, secured the information included therein. The Commission reminds MBS that pursuant to *Section I (A)(1)(d), Substantive Standards & Appendix VII, Standards of Accreditation*, MBS must secure written documentation from either the graduate or the employer verifying employment. As the forms appear to be executed by school personnel, the school's response does not make clear that the school is fulfilling this requirement. Although, the *Guidelines for Employment Classification* allow for the school to gather verbal verifications from both the graduate and the employer in cases when the school can demonstrate diligent yet unsuccessful efforts to secure written documentation, the school's records do not make a demonstration of diligent efforts, nor do they identify the date of verbal verification with the graduate and the employer as required. The Commission also noted a significant reliance on graduate social media content as verification of in-field employment, particularly for non-graduated students. The Commission questioned whether this reliance is a sufficient demonstration that the employment is for a reasonable period of time, is based on program objectives, and can be considered consistent and sustainable, such that these students can be considered "placed in field" in the ACCSC Graduation and Employment Chart.

Overall, given the history of low rates, and the questions surrounding the school’s records of initial graduate employment, the Commission determined that additional monitoring is warranted and voted to continue the school on Warning.

Based on the foregoing, the Commission directs the school to prepare for the on-site evaluation team’s review:

- a. Retention Charts for the 15-month and 18-month Barber/Styling (Certificate) programs using a **January 2023 Report Date**
- b. Graduation and Employment Charts for the 15-month and 18-month Barber/Styling (Certificate) programs using a **January 2023 Report Date**.
- c. Summary information for the Graduation and Employment Charts organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
  - i. For each student start, provide the following information:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal / Termination Date
1	12345	Barbering	01/10/2021	06/01/2022	N/A
2	12346	Barbering	01/10/2021	N/A	07/10/2021

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

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

- iii. Supporting and verifiable documentation for each student in (ii.) above to include minimally, external documentation such as military orders, letter from physician/doctor, death notice/obituary, public record of incarceration.
- iv. For each graduate classified as employed in the field<sup>1</sup> (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Graduation Date	Employer, Contact, Address, & Ph. #	Date of Initial Employ.	Descriptive Job Title and Responsibilities	Source of Verification <sup>2</sup> (i.e., graduate or employer)
1								

- v. Supporting and verifiable documentation or a narrative justification for each graduate in (iv.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study.
- vi. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

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

- vii. Supporting and verifiable written documentation for each graduate in (vi.) above to include a signed statement from the graduate with the graduate’s name and contact information; an

<sup>1</sup> See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

<sup>2</sup> Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.



attestation that the self-employment is aligned with the individual’s employment goals, is vocational, is based on and related to the education and training received; an attestation that the graduate is earning training-related income; and in cases where licensure is required for employment, an attestation that such licensure has been achieved.

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

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

ix. Supporting and verifiable documentation for each graduate in (viii.) above to include written documentation from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school.

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

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

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

d. Any additional information, to include contemporaneous retention, graduation, or employment data, that the school believes will be useful to the on-site evaluation team in their review of MBS’s student achievement.

2. MBS must demonstrate that the school discloses, minimally, the graduation rate, graduate employment rate, and licensure/certification examination pass rate for each program as last reported to the Commission (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). The Commission noted that the disclosure of graduation and employment rates in the section of the school’s catalog titled “Consumer Facts and Information” does not include the population base or timeframe upon which the rates are based (e.g. of the 63 students available for graduation between January 2019 and December 2019, 33 students graduated; and of the 33 graduates available for employment 20 achieved in-field employment). Additionally, the disclosure excludes the graduate licensure rates.

In addition, the Commission noted that the school discloses student achievement on the website: <http://michiganbarberschool.org/consumer-disclosure/>. As highlighted in the Commission’s June 2, 2022 letter, the disclosures do not align with the most recently reported rates. The information published to the school’s website still references a June 2017-May 2018 award year for the 15-month Barber/Stylist program, and a January 2017 to December 2017 award year for the 18-month Barber/Stylist program, information which aligns with the 2020 Annual Report.

Based on the foregoing, MBS has not demonstrated that the school consistently discloses graduation, employment, and licensure rates as last reported to the Commission. Accordingly, MBS must review and revise all disclosures of graduation and employment rates to ensure that the school is consistently disclosing the rates as last reported to the Commission – specifically the 2022 Annual Report – and



provide for the on-site evaluation team’s review an updated catalog and evidence demonstrating the most recently report rates and the population base and timeframe upon which each rate is based.

**Warning Restrictions:**

Pursuant to *Section VII (K)(9), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

**Notification to Students**

The Commission requires the school to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(8) Rules of Process and Procedure, Standards of Accreditation*).

**Response Requirements:**

As the school is currently in the Renewal of Accreditation process, the Commission directs Michigan Barber School to provide the on-site evaluation team with documentation to demonstrate compliance in the areas delineated above. The school may also provide the on-site evaluation team with any other information the school believes will be useful to demonstrate the school’s compliance with ACCSC’s requirements in this area. The On-Site Evaluation Report that summarizes the findings of the team will provide details regarding the Commission’s review of the school and the additional information requested for a response. The school must respond to each Team Finding, if applicable, and submit all Additional Information Required as stated in the report.

For further assistance or additional information, please contact [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED]

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.  
Executive Director

c: [REDACTED]  
[REDACTED]  
[REDACTED]