



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
1722 N. Street, N.W., Washington, D.C. 20036
Telephone : 202-955-1113 Fax: 202-955-1118
<http://www.accet.org>

May 4, 2017

VIA EMAIL & FEDERAL EXPRESS
(jmacklin@jrenee.edu)

Ms. Juanita Macklin, President and CEO
J'Renee College
415 Airport Road
Elgin, IL 60123

***Re: Reaccreditation Denied
(Appealable, Not a final action)
Complaint #1423 Closed With Merit
ACCET ID #1272***

Dear Ms. Macklin,

This letter is to inform you that, at its April 2017 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny reaccreditation to J'Renee College, located in Elgin, Illinois.

The decision was based upon a careful review and evaluation of the record, including the institution's Analytic Self-Evaluation Report (ASER), the on-site visit team report (visit conducted February 8-9, 2016), and the institution's response to that report, dated March 23, 2016. It is noted for the record that the Commission originally considered the institution's application for reaccreditation at its April 2016 meeting. At that time, the Commission voted to issue a Show Cause directive based on the severity of issues found unresolved in the institution's response to the team report, particularly issues surrounding records, refunds, and the institution's catalog. The Commission also voted to defer consideration for one cycle, directed a two-person follow-up visit to be conducted in the August 2016 review cycle, and directed the institution to submit an interim report for review at the August 2016 meeting.

At the August 2016 meeting, the Commission reviewed the follow-up visit report (visit conducted May 26, 2017), the institution's response to that report received June 20, 2016, and the institution's interim report received May 24, 2017, and voted to continue the Show Cause directive based on continued concerns regarding Records, Financial Procedures, Financial Aid, Enrollment, Attendance, and Participant Satisfaction. The Commission also voted to defer consideration for an additional cycle and directed the institution to submit a second interim report for review at the December 2016.

At the December 2016 meeting, the Commission reviewed the institution's interim report, received October 28, 2016, and voted to continue the Show Cause directive based on continuing concerns

regarding Standard III-B: Financial Procedures, Standard III-C: Financial Aid/Scholarships, Standard VIII – B: Attendance, and Standard VIII – C: Participant Satisfaction. The Commission voted to defer consideration for a final cycle and required the institution to submit an interim report to address compliance with Standards III.B, III.C, VIII.B, and VIII.C.

At the April 2017 meeting, upon its review of the institution's interim report received February 28, 2017, as well as Complaint #1423 (issued by a former employee on December 1, 2016) and the institution's response to that complaint, received January 13, 2017, the Commission determined that the institution failed to adequately demonstrate compliance with respect to ACCET standards, policies, and procedures, relative to the following findings:

1. Standard III-B: Financial Procedure

The institution did not demonstrate that it ensures receipt of tuition payments and other monies is properly recorded and tracked; that cancellation and refund policies are written, fair, and equitable, are consistently administered, and comply with statutory, regulatory, and accreditation requirements.

The December 2016 Commission Action letter directed the institution to provide evidence of systematic and effective implementation of the institution's revised cancellation and refund policy to demonstrate appropriate refund calculations for all students who cancel, drop or were withdrawn. The institution was directed to provide refund information for the previously noted seven students ([REDACTED]), as well as any additional student cancellations, drops, or withdrawals since the institution's interim report to include all required information: (a) enrollment agreements, (b) record of the student's daily attendance, (c) the student's ledger card/payment and charge history, (d) refund calculation worksheets based on the institution's cancellation and refund policy, and (e) proof of any refunds made, if applicable (e.g. cancelled checks, receipts showing credit back to credit cards, wire transfers, etc.) to demonstrate appropriate implementation of the institution's ACCET-compliant cancellation and refund policy. Further, the institution was directed to provide evidence of re-calculation of all prior 2016 withdrawals to ensure that no unearned fees were erroneously retained by the institution, as previously requested.

In its response, the institution provided a withdrawal list for calendar year 2016, including 24 students: eighteen LPN students, five BNAT students, and one "PreReq" student. The institution's response included enrollment agreements, refund calculation worksheets, Return to Title IV (R2T4) calculation worksheets, Student Ledgers, attendance records, and proof of refunds as applicable.

Additionally, the institution's response to Complaint #1423 included refund worksheets, and R2T4 calculations, for ten of the students also addressed in the institution's interim report. It is noted that the institution's Complaint response (submitted January 13, 2017) and the institution interim report (submitted February 28, 2017) do not demonstrate alignment of attendance records

as recorded by the Last Date of Attendance (LDA) on refund calculation worksheets and Return to Title IV (R2T4) worksheets for five students as noted below, resulting in inconsistent refund and R2T4 calculations.

Last Date of Attendance (LDA):

Student	Interim Report Refund Worksheet	Complaint Response Refund Worksheet	Interim Report R2T4 Worksheet	Complaint Response R2T4 Worksheet
██████████	12/2/16	12/9/16	12/9/16	12/9/16
██████████	11/17/16	11/11/16	11/17/16	11/11/16
██████████	7/11/16	7/11/16	7/11/16	7/26/16
██████████	7/18/16	8/2/16	7/18/16	8/2/16
██████████	10/18/16	11/22/16	11/22/16	11/22/16

Further, within the institution’s singular interim report submission, the recorded LDA does not align across all documents for the following four students, as indicated below:

Student	“Withdrawal List”	Attendance History “LPN Supporting Docs”	Refund Worksheet	R2T4 Worksheet
██████████	12/9/16	12/2/16	12/2/16	12/9/16
██████████	11/11/16	11/17/16	11/17/16	11/17/16
██████████	8/2/16	7/18/16	7/18/16	7/18/16
██████████	11/22/16	11/22/17	10/18/16	11/22/16

The Commission found that the lack of consistency in attendance reporting and its effect on financial records and refunds for the same students within the same submission and across two different submissions with no explanation of revision or amendment, does not demonstrate proper financial controls, refund processing, or sound record keeping. This finding persists through the institution’s documentation, including:

- a) Multiple versions of refund calculation worksheets were provided in the institution’s complaint response and in the institution’s interim report for the same students indicating various refund amounts. For example, ██████████ refund calculation worksheet as provided in the complaint response indicates 12% of the LPN program completed and a remaining balance owed to the school of \$187.50. However, the calculation worksheet provided in the interim report for the same student, indicates 9% of the LPN program completed and a “tuition adjustment” of (\$3,680.35).
- b) The refund amounts calculated in the institution’s complaint response and the institution’s interim report are inconsistent, in part as a result of inconsistent application of fees, as the complaint response shows fees being assessed in whole, whereas the interim report indicates the assessment of fees on a prorated basis. For example, ██████████ ██████████ refund calculation worksheet as provided in the complaint response indicates

the following fees and “student portion” assessed: Nursing Lab Fee, \$1,365; Course Fee, \$1,000; Electronics Fee, \$500. Whereas the refund calculation worksheet for the same student and program as provided in the interim report indicates that these fees were assessed only in part: Nursing Lab Fee, \$128.47; Course Fee, \$47.06; Electronics Fee, \$47.60.

- c) Among the student refunds reviewed, it is noted that documentation of the actual refund (cancelled check) was provided for only three students: [REDACTED] and [REDACTED] by way of the interim report, and [REDACTED] as part of the complaint response.
- d) The institution’s refund calculation worksheet continues to include a calculation of 10% unearned tuition, though it remains unclear if the institution is retaining this amount.

Additionally, the institution provided student ledgers in its interim report that indicate an assessment of a “surcharge” for both the HESI exam and program application. This charge is not included in the institution’s enrollment agreement, nor is it being assessed consistently. For example, student [REDACTED] was charged an additional surcharge of \$20.80 for the \$50 HESI, while other students were charged no surcharge or a \$0.80 surcharge. Student [REDACTED] was charged \$5.52 in surcharges for the \$45 application fee, whereas other applicants were not assessed the surcharge or were only charged \$0.72.

Further, student ledgers for the LPN program indicate separate payment of \$50 for the “HESI A2” exam; however, the institution lists the HESI test kit as included in the \$500 electronics fee as noted in the institution’s previous interim report.

After one year of reviewing the institution's financial practices and administration of a compliant cancellation and refund policy, the Commission found that the concerns identified in the institution’s original team report have not been resolved, but have increased. The institution did not demonstrate the responsible management of financial practices, including adequate documentation, tracking, and application of an ACCET compliant cancellation and refund policy. Therefore, the institution failed to demonstrate compliance with this standard.

2. Standard III-C: Financial Assistance/Scholarships

The institution did not demonstrate that student financial assistance programs, including federal and state financial aid programs, are responsibly administered, governed by written policies and procedures, and are in full compliance with relevant statutes and regulations. The institution did not demonstrate that student financial assistance is awarded in a fair and equitable manner, as required by the standard.

It is noted that the most recent version of the institution’s ECAR indicates approval only for the Practical Nursing program. However, it appears that Title IV disbursements were provided to the following twelve students for either the ineligible avocational prerequisite courses, an

avocational stand-alone Anatomy and Physiology (A&P) course, or the ineligible Basic Nurse Assistant Training (BNAT) program prior to enrolling in the LPN program: [REDACTED]

The interim report further indicated anomalies in five of the invoices provided demonstrating that the institution is retaining financial aid disbursements for these ineligible programs. For example, the student ledger for [REDACTED] indicated that she was charged \$975 for “Eng 101” on 6/22/15, and “Bio 210 A&P” on 6/23/15. Disbursements of sub and unsub loans are noted on 7/22/15 (1st disbursement) and 7/27/15 (second disbursement), totaling \$4,577. The student was refunded \$2,927 on 8/13/15 and the remaining balance (\$765) was noted as a credit on the student’s account until she was charged for the LPN program on 8/17/16. Finally, an additional disbursement (noted as 1st disbursement) was applied on 9/18/16.

After one year of reviewing the institution's administration of Federal Financial Aid Funds, the Commission noted that the concerns identified in the institution’s original team report have not been resolved, but have alarmingly increased. The institution did not demonstrate that student financial assistance programs, including federal financial aid programs, are responsibly administered, governed by written policies and procedures, and are in full compliance with relevant statutes and regulations. Therefore, the institution failed to demonstrate compliance with this standard.

3. Standard VIII.B: Attendance:

The institution did not demonstrate that it implements written policies and procedures for monitoring and documenting attendance to demonstrate a clear record of consistent attendance recording.

The institution’s interim report included varying dates of attendance as addressed under item #1. Additionally, the attendance record for four students enrolled in the same November 1, 2016 AM LPN cohort demonstrated differing class schedules for the same program. For example, student [REDACTED] attended eight hours of class on November 2nd, 7th, and 9th, and three hours of class on November 14th, 2016. No other student attendance records indicate attendance or absence on those days. Further, student [REDACTED] and [REDACTED] attended five hours on November 3th, 2016, while students [REDACTED] and [REDACTED] attendance records indicate neither attendance nor absence.

Further, a number of students appear to be enrolled for pre-requisite or stand-alone courses simultaneous with enrollment in the LPN program. While enrollment agreements were provided for these courses, attendance records appear to combine both pre-requisite courses and the LPN program courses. For example, student [REDACTED] ledger indicates that he was enrolled in the LPN program and three weeks later enrolled in a stand-alone A&P course. His Last Date of Attendance (LDA) is listed as October 18, 2016 on the refund calculation

worksheet, while attendance records indicate attendance through November 22nd. It is unclear if attendance through November 22 is for the LPN or the stand-alone A&P course.

After one year of reviewing the institution's tracking of student attendance, the Commission noted that the concerns noted in the institution's original team report have not been resolved, but have increased. The institution did not demonstrate that it establishes and implements written policies and procedures for monitoring and documenting attendance to demonstrate a consistent record of student's attendance history and last date of attendance. Therefore, the institution failed to demonstrate compliance with this standards.

Since denial of reaccreditation is an adverse action by the Accrediting Commission, the institution may appeal the decision. The full procedures and guidelines for appealing the decision are outlined in Document 11, Policies and Practices of the Accrediting Commission, which is available on our website at www.accet.org.

If the institution wishes to appeal the decision, the Commission must receive written notification no later than fifteen (15) calendar days from receipt of this letter, in addition to a certified or cashier's check in the amount of \$8,500.00, payable to ACCET, for an appeals hearing. This notification must be accompanied by an affidavit signed by an authorized representative of the institution indicating that a Notice of Status of Accreditation notifying interested parties of the Commission's adverse action has been disseminated to new enrollees and posted in conspicuous places at the institution to include, at minimum, the admissions office and student lounge or comparable location. In addition, the institution must submit a written teach-out plan that is in accordance with ACCET Document 32 – Closing/Teach-Out Policy.

In the case of an appeal, a written statement, plus six (6) additional copies regarding the grounds for the appeal, saved as PDF documents and copied to individual flash drives, must be submitted to the ACCET office within sixty (60) calendar days from receipt of this letter. The appeal process allows for the institution to provide clarification of and/or new information regarding the conditions at the institution at the time the Accrediting Commission made its decision to deny or withdraw accreditation. The appeal process does not allow for consideration of changes that have been made by or at the institution or new information created or obtained after the Commission's action to deny or withdraw accreditation, except under such circumstances when the Commission's adverse action included a finding of non-compliance with Standard III-A, Financial Stability, whereupon the Appeals Panel may consider, on a one-time basis only, such financial information provided all of the following conditions are met:

- The only remaining deficiency cited by the Commission in support of a final adverse action decision is the institution's failure to meet ACCET Standard III-A, Financial Stability, with the institution's non-compliance with Standard III-A the sole deficiency warranting a final adverse action.
- The financial information was unavailable to the institution until after the Commission's decision was made and is included in the written statement of the grounds for appeal submitted in accordance with the ACCET appeals process; and

J'Renee College

Mary 4, 2017

Page 7 of 7

- The financial information provided is significant and bears materially on the specified financial deficiencies identified by the Commission.

The Appeals Panel shall apply such criteria of significance and materiality as established by the Commission. Further, any determination made by the Appeals Panel relative to this new financial information shall not constitute a basis for further appeal.

It remains our hope that the accreditation evaluation process has served to strengthen your institution's commitment to and development of administrative and academic policies, procedures, and practices that inspire a high quality of education and training for your students.

Sincerely,



William V. Larkin, Ed. D.

Executive Director

WVL/lao

CC: Mr. Herman Bounds, Chief, Accreditation Division, US ED (aslrecordsmanager@ed.gov)
Mr. Douglas Parrott, ACD - Chicago/Denver, US ED (douglas.parrott@ed.gov)
Mr. Ron Bennett, Director, School Eligibility Service Group, US ED (ron.bennett@ed.gov)
Ms. Nina Tangman, Associate Director, IL Board of Higher Education, (tangman@ibhe.org)