



August 21, 2014

VIA EMAIL & FEDERAL EXPRESS
(pjanssen@springinstitute.org)

Mr. Peter Janssen, CFO
Spring Institute for Intercultural Learning
1373 Grant Street
Denver, CO 80207

***Re: Reaccreditation Denied/Accreditation Withdrawn;
(Appealable/Not a Final Action)
ACCET ID #1058***

Dear Mr. Janssen:

This letter is to inform you that, at its August 2014 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny reaccreditation to Spring Institute for Intercultural Learning, located in Denver, Colorado.

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 June 17 – 18, 2014), and the institution's response to that report, dated July 18, 2014. It is noted that one weakness cited in the team report was adequately addressed in the institution's response and accepted by the Commission. However, the Commission determined that the institution has not adequately demonstrated compliance with respect to ACCET standards, policies, and procedures, relative to the following findings:

1. Standard II-A: Governance; Standard VII-A: Recruitment

The institution failed to demonstrate that its senior management team has policies and practices in place that effectively ensure the institution's compliance with accreditation requirements. It did not demonstrate that informational and promotional materials, advertising, and representations made by or on behalf of the institution for recruiting purposes make only justifiable and provable claims regarding the courses and programs.

The team report indicated that the institution was using a different program name for its Adult Basic English/English as a Second Language (ABE/ESL) program than that approved by ACCET and the institution's website was advertising unapproved program names such as Community ESL and Pre-Employment Training. In the institution's response, it indicated that it was in the process of updating promotional materials to provide program names consistent with ACCET approval. However, the institution failed to provide evidence of this update to demonstrate implementation of the approved program name for the Adult Basic English/English as a Second Language program. A recent review of the institution's website

showed that the institution was continuing to advertise Community ESL and Pre-Employment Training, while the Adult Basic English/English as a Second Language program name was not being used on the website. Therefore, this institution has failed to demonstrate that its senior management ensures compliance with accreditation requirements and that its informational and promotional materials and advertising provide program information consistent with ACCET approval.

2. Standard II-B: Operational Management

The institution failed to demonstrate that written policies and procedures effectively guide the day-to-day operations of the institution. The team report indicated that the institution's policies and procedures manual was incomplete, as it did not include policies and procedures for student academic progress, attendance, completion tracking, curriculum revision, and instructor supervision.

The institution's response provided an updated policies and procedures manual which included the missing policies, but the Commission noted that the procedures for student academic progress, attendance, completion tracking, curriculum revision, and instructor supervision were incomplete, as discussed below under each relevant standard. Additionally, the institution did not provide evidence that this manual was communicated to staff or that relevant training was provided on the new policies and procedures to evidence effective implementation of the revised manual. Therefore, the institution has failed to demonstrate that it systematically and effectively implements written policies and procedures that guide its operations.

3. Standard II-C: Personnel Management

The institution failed to demonstrate that it develops, implements, and maintains overall written policies and procedures for the systematic and effective supervision and evaluation of its employees. The team report indicated that despite its policy relative to annual performance reviews, there was no documentation verifying performance evaluations had been conducted for calendar year 2013.

The institution stated in its response that it did not conduct evaluations in 2013 due to workload issues and postponed the evaluation process until Summer 2014. No documentation was provided to evidence current administration of the annual evaluation process, and no 2013-2014 evaluations were provided. The rescheduling of the annual review process to halfway through the following year, with no completed evaluations included in the institution's response on July 18th, did not provide the Commission with confidence in the institution's ability to consistently implement its policy for annual performance evaluations. Therefore, the institution has failed to demonstrate the implementation and maintenance of written policies and procedures for the systematic and effective supervision and evaluation of personnel as required by this standard.

4. Standard IV-A: Educational Goals and Objectives; Standard IV-B: Program/Instructional Materials

The institution failed to demonstrate that its curricular content is preplanned and presents a sound, systematic, and sequential educational methodology and that sufficient and appropriate knowledge and skill elements are included to ensure adequate preparation for the expected performance outcomes in the program. It further failed to evidence that program materials demonstrate the appropriate scope, sequence, and depth of each program or course in relation to the stated goals and objectives, and that program materials are readily available and facilitate positive learning outcomes. The team report indicated that the Customized Short-Term Intensive English program did not have a curriculum, syllabi, or lesson plans. While the ASER indicated that the goals of this program are drawn from a bank of learning objectives to specifically focus on areas of improvement for the individual participants and that the program's curriculum is then developed from these elements, the team report indicates that the institution did not provide evidence of this process or the resulting customized curricular materials, syllabi, or lesson plans. Further, the team report indicated that the institution provided the same core textbook, *Skills for Success Level 2*, to all students in the Customized Short-Term Intensive English program regardless of level or proficiency.

In its response, the institution stated that its instructors had been using syllabi and lesson plans, provided three syllabi and three lesson plans for the Customized Short-Term Intensive English program, and indicated that it was adding new syllabus and lesson plan templates to its handbook for future use. However, the institution did not provide any policies and procedures to guide the process for the creation and supervision of these syllabi or lesson plans to ensure that the materials created consistently align with the curriculum and are appropriately customized to the needs of the students. Additionally, the Commission was seriously concerned over the institution's lack of appropriate textbooks for students in the Customized Short-Term Intensive English program. The institution's response indicated that it does not have enough students to justify purchasing complete sets of textbooks, so it has put together a textbook list and asked the publisher for examination copies of each book in the series. This request for examination copies does not provide the Commission with confidence that students currently enrolled in the program have textbooks appropriate to their proficiency level and educational goals or that textbooks are in sufficient supply to be readily available to students enrolling in the program. In addition, the Commission is concerned about the institution's plan to request examination copies for the textbooks on its list instead of purchasing these textbooks, as the reliance on exam copies rather than paid classroom versions of the textbooks for this program exposes the school to copyright and use issues. Given the lack of evidence for appropriate, readily available textbooks, as well as the lack of information and documentation regarding the syllabus and lesson plan creation and oversight process, the Commission has determined that the institution has failed to demonstrate preplanned curricular content and program materials that are readily available and ensure adequate preparation for the stated learning objectives, which can only be evidenced in practice over time.

5. Standard IV-C: Performance Measurements

The institution failed to demonstrate that it has a sound, written assessment system that contains a set of defined elements, such as a grading scale, weighting factors, tests, quizzes, projects, attendance, and participation, that are appropriately related to the performance objectives of the program. The team report indicated that the institution did not demonstrate a system of performance measurements for the Customized Intensive English program, as students in this program progressed through levels based solely on instructor recommendations.

The institution indicated in its response that students in the Customized Intensive English program are now tested at the end of each term to determine their English ability based on a six-level language rubric. They progress to the next level if they meet 80% of the competencies in the level. The response stated that one student completed a term, was given the test to determine her level, and the results were documented on her final report. However, no documentation of the test was provided to evidence the alignment of this test to the performance objectives of each level, and no completed tests, test grading rubrics, or final reports were included to evidence its implementation. Further, the Commission noted that the institution's response only addressed a final exam for each level, while the policy manual provided in the institution's response under Standard II-B: Operational Management indicates that the performance measurements for the Customized Intensive English program include attendance, participation, homework, tests, quizzes, and a final presentation. The institution's response to this standard did not provide any information regarding these performance indicators, and no documentation was provided to evidence their implementation. Therefore, the institution has failed to demonstrate that it has systematically and effectively implemented a system of performance measurements for the Customized Intensive English program, which can only be evidenced in practice over time.

6. Standard IV-D: Curriculum Review/Revision

The institution failed to demonstrate that it uses systematic and effective written procedures to continuously monitor and improve the curriculum, and that these procedures focus on a comprehensive review of the curriculum as it relates to the expected learning outcomes and include soliciting feedback from relevant constituencies, such as faculty, students, graduates, and advisory/certification boards, as well as analysis of completion results. The team report indicated that teachers and staff select instructional materials and that the Adult Basic English/English as a Second Language (ABE/ESL) program content is informed by the Colorado Department of Education, but the institution's programs have no formal process or documentation of regular curriculum review and revision.

The institution provided two policies in its response: one for the ABE/ESL program and one for the Customized Intensive English program. The policy for the ABE/ESL program provided information about assessments and leveling, but did not address curriculum review. The Commission noted that a brief policy for curriculum revision of the ABE/ESL program was included in the revised policy manual provided under Standard II-B: Operational Management, which indicated that the curriculum would be reviewed by instructors and coordination staff

annually. The new policy for the Customized Intensive English program included information about textbooks, stating that texts are chosen based on a participant's level of English and that the rubric for the levels guides the textbook selection, and indicated that curriculum is reviewed by the instructional team each term based on a student survey and an oral feedback session with the instructor. The policies did not indicate what other data is gathered for the curriculum review process apart from requirements from the State of Colorado for the ABE/ESL program and student feedback for the Customized Intensive English program. Additionally, the curriculum revision policy for the ABE/ESL program did not include a procedure for soliciting and incorporating feedback from students or instructors, and the policy for the Customized Intensive English program did not include a procedure for soliciting systematic feedback from faculty. Neither policy indicated a review of the level rubric or a timeline for the steps in the curriculum review process, particularly when the review results in revisions to the curriculum. Further, the institution's policies did not include specific information on who is directly involved in curriculum revision. While the policy for the ABE/ESL program indicated that "instructors and coordination staff" will review the curriculum, the Commission noted that over twenty people are involved in the ABE/ESL program. The policy for the Customized Intensive English program indicated that curriculum review will be done by an "instructional team", but did not indicate the composition of this team. No documentation was provided for either program to evidence regular curriculum review and revision. Given the incomplete policies for curriculum review and revision and the lack of evidence for systematic and effective implementation of a written procedure for curriculum review, the institution has not demonstrated compliance with this standard which can only be evidenced in practice over time.

7. Standard VI-A: Qualifications of Instructional Personnel

The institution failed to demonstrate that instructional personnel possess the appropriate credentials to qualify them for their training assignments. The team report indicated that although the institution requires instructors to have a certificate in ESL instruction, there was no documentation of ESOL/TESOL/CELTA certification in instructor personnel files. Additionally, the ACCET Document 21 – ACCET On-Site Visit Personnel File/Qualifications Checklist completed by the institution for the on-site visit did not include information on certification for one instructor.

The institution's response indicated that the program manager for ABE/ESL did not keep copies of certifications, but they would be collected at the upcoming August 2014 meeting. The response further indicated that the institution had added certification to its personnel file checklist and would collect copies of certification in the future. However, no documentation was provided to evidence the certifications of the institution's instructors, and the institution did not provide an updated personnel file checklist to demonstrate the revision stated in the response. Further, the response only included a plan to collect certifications from the ABE/ESL instructors, but as the institution requires all instructors to have a certificate in ESL instruction, evidence of certification is also required of the Customized Intensive English instructors. Therefore, the institution has not demonstrated that its policies for instructor qualification requirements are systematically and effectively implemented.

8. Standard VI-B: Supervision of Instruction

The institution failed to demonstrate that supervisors of instructional personnel demonstrate good practice in the evaluation of instructors and that regular classroom observations, along with student, peer, and supervisory feedback, are documented and effectively utilized to enhance the quality of education. The team report indicated that the institution does not have a written policy and procedure that outlines the supervision of instruction. The team report also indicated that the institution did not provide classroom observations and evaluations for all instructors to demonstrate the systematic and effective implementation of an evaluation process.

The institution provided a policy for the observation of Customized Intensive English instructors requiring observations twice a year, and the institution's policy manual indicated that ABE/ESL instructors were observed yearly. The institution's policy of instructor supervision as listed in the policy manual indicated that instructors were supervised by the Program Manager for their program. The response indicated that observations for the Customized Intensive English instructors were scheduled for the third week in July 2014, three days after the team report response was due, and provided documentation of 14 ABE/ESL instructor observations from 2013. All observation forms had detailed, constructive individual feedback and comments from the peer observer. However, the observation forms provided in the institution's response were not signed or dated by the observed instructor to evidence communication and discussion of the observation.

Additionally, comparison of the organizational chart, On-Site Personnel Qualifications/File Checklist, and the observations attached to the team report indicated that two instructors for the ABE/ESL program did not have documentation of observations: P. Allingham and D. Reed. Further, the observations provided in the response were all conducted by the founder of the institution, who the institution indicated functions as a peer observer. However, the process for ensuring that relevant feedback from these peer observations is communicated to the supervisor for incorporation into instructor evaluation was not outlined in the policy, nor was information regarding supervisory feedback.

The institution's policy for instructor supervision indicated that the ABE/ESL Program Manager is responsible for ensuring that ABE/ESL instructors follow the requirements of their contract, and that a review of content and related learning experiences was included in the supervision of ABE/ESL instructors. However, information regarding this review was not included in the policy. Due to the lack of documentation of recent instructor observation for all instructors in both programs, the lack of documented communication with instructors regarding their observations, and the incomplete policy and procedure for instructor supervision, the institution has not demonstrated that it has systematically and effectively implemented written policies and procedures for regular instructor observation and supervision which can only be evidenced in practice over time as required by this standard.

9. Standard VI-C: Instructor Orientation and Training

The institution has not demonstrated that it implements a written policy for the effective orientation and training of instructional personnel to ensure a consistent, high level of instruction. The team report indicated that the institution did not provide evidence of the implementation of its training process, as the orientation checklist created by the institution was not included in personnel files.

The institution indicated in its response that it had revised its orientation checklist for both the ABE/ESL and Customized Intensive English programs, included a policy on instructor orientation for these programs in the policy manual, and revised the personnel file checklist to include the orientation checklist. However, no evidence of the implementation of this policy and procedure for instructor orientation was provided. Therefore, the institution has not demonstrated the systematic and effective implementation of its instructor orientation policy and procedure in practice over time as required by this standard.

10. Standard VIII-A: Student Progress

The institution failed to demonstrate that it effectively monitors, assesses, and records the progress of participants utilizing a sound assessment system with a set of defined elements that are appropriately related to the performance objectives of the programs or courses and that student progress is documented consistently in accordance with institutionally established performance outcomes and is communicated to all participants. It also failed to demonstrate that participants are informed of their progress on a regular and timely basis and that it publishes clear descriptions of its requirements for satisfactory student progress and utilizes sound written policies and procedures to determine student compliance with these requirements and to document results. The team report indicated that the institution does not have a published student progress policy for either its ABE/ESL program or the Customized Intensive English program, and noted that the current processes for tracking student progress do not meet the requirements of ACCET Document 18.IEP – Student Progress Policy. The team report indicated that the institution does not have a method of evaluation throughout a level to ensure that students are kept aware of their academic progress, and that students in the Customized Intensive English program do not have a systematic method for level progression, as progression occurs at the instructor's discretion.

In its response, the institution provided two policies, one for the ABE/ESL program and one for the Customized Intensive English program. However, neither policy fully addressed the concerns raised in the team report. The policy for the ABE/ESL program indicated that "gains will be documented each 40-60 hours of instruction" and "instructors provide qualitative and quantitative assessments throughout class and recommends participants for final exams or post-testing." The policy also states, "There is no probation for participants in these Community Programs as we cannot deny them the capacity to attend Federal Funded programs." While the Commission understands that the institution is offering the ABE/ESL program through a federal funding source, this method of funding does not exempt the institution from setting academic standards and creating support systems for students who do not meet these standards. The institution's

policy for the ABE/ESL program currently states that students who do not make gains after one year can be recommended other services, and, therefore, the institution must have a policy in place to ensure that students understand the standards for academic progress and identify and support students who are at risk of being recommended other services. The satisfactory progress policy for the ABE/ESL program did not indicate how often students receive feedback regarding their academic performance, how students receive a recommendation for final exams or post-testing, what processes are in place to support students who are not recommended for these exams, what constitutes satisfactory academic progress, or what processes are in place for students who do not meet satisfactory academic progress standards.

The student progress policy for the Customized Intensive English program indicated that students are given a test at the end of the level in each subject and progress to the next level if they meet 80% of the competencies at their current level. The policy included a grade breakdown and indicated that a student's level and grade are provided in midterm and final reports. The policy also indicated that students are given three terms to progress to the next level and students who are not making satisfactory progress "are given extra assistance to learn and succeed." The policy indicates that students are given a grade within a level and a level test to determine advancement, but it is not clear what relationship this level test has to the grades given during the level to ensure that the grades are an accurate reflection of the student's progress and performance on the level test. The policy for the Customized Intensive English program does not include many of the items required in ACCET Document 18.IEP – Satisfactory Progress Policy, including both a qualitative and a quantitative measurement of satisfactory progress, a limit of 36 months on the maximum cumulative total length of language training, a documented learning plan for students who repeat a level more than once, consequences of failure to meet satisfactory progress standards before termination, and an appeals policy. The institution provided no documentation to evidence communication to students or instructors, no processes for monitoring, assessing, or recording student progress, and no documentation of implementation of either policy. Therefore, the Commission determined that the institution failed to demonstrate the systematic and effective implementation of policies and procedures that effectively monitor, assess, and record the progress of its students, which can only be evidenced in practice over time as required by this standard.

11. Standard VIII-B: Attendance

The institution failed to demonstrate that it has established and implemented written policies and procedures for monitoring and documenting attendance and that the attendance policy is effective in ensuring that student participation and preparation are consistent with the expected performance outcomes of its programs. The team report indicated that the institution's policy for tardiness and early departures was unclear, as it did not indicate at what point students were marked tardy and provide any consequences for tardiness. Students interviewed by the team did not know the policy for arriving late or leaving early from class, and the class observed by the team had two students who came ten minutes late to class but were not marked tardy by the instructor. The team report further indicated that the attendance policy for the Customized Intensive English program states that students falling below 80% attendance "will be considered

out of valid F-1 status and may have their I-20 terminated,” but does not include information regarding attendance notifications and warnings, a probationary period, or at what point a student will be terminated from the program.

The institution’s response provided two policies, one for the ABE/ESL program and one for the Customized Intensive English program. The ABE/ESL policy states that “a student is required to attend 80% of class in a semester,” and that a student who attends 80-100% of the classes in a session “or has only excused absences” are automatically enrolled the following term. The policy indicates that students who leave a message or let their teacher know beforehand that they will miss class will be excused from class, and in certain situations letting the teacher know afterwards is also acceptable, “but not for long term absences.” The policy for the ABE/ESL program indicates that students who are below the 80% minimum attendance requirement are not re-enrolled automatically and must either talk to their instructor or re-register depending on how far they are below the attendance standard.

The institution’s response also indicated that the policy for the Customized Intensive English program has been modified to include when students are notified about tardiness and early departures and indicate that students are given a written warning if their attendance drops to 90%. A review of the institution’s policy manual indicated that the attendance policy for the Customized Intensive English program had been revised to indicate that students who have less than 80% attendance in two consecutive terms will be terminated from the program and have their I-20 terminated, and that tardiness and early departures of more than 10 minutes will result in ½ day absence.

However, the Commission noted that the attendance policy for the ABE/ESL program did not include information about tardiness and early departures as required by ACCET Document 35 – Attendance Policy or information regarding when and how students are notified of their attendance performance. Further, the inclusion of “excused absences” in the attendance policy is contrary to the institution’s statement, and ACCET long-standing practice, that students must attend class. Students who miss class, whether by choice or for circumstances beyond their control, are provided a 20% allowance before they reach the 80% minimum attendance to avoid situations where a student receives attendance credit for classes he or she did not attend. The Commission also noted the lack of consequences or support for ABE/ESL students who fall below the minimum attendance requirement apart from requiring steps for re-enrollment the following term.

Further, the attendance policy for the Customized Intensive English program did not provide information on a schedule by which students are notified of their attendance status. While the policy indicated when students are provided attendance warnings for tardiness, early departures, and absences, it did not indicate when all students receive feedback on their attendance. Additionally, no documentation of communication and implementation of these policies was provided in the response. Lacking this documentation, and given the outstanding issues in the institution’s revised attendance policies, the Commission has determined that the institution failed to demonstrate that it has effective written policies and procedures for monitoring and

documenting attendance that have been systematically and effectively implemented which can only be evidenced in practice over time as required by this standard.

12. Standard VIII-E: Completion and Placement

The institution did not demonstrate that written policies and procedures are followed that provide an effective means to regularly assess, document, and validate the quality of the education and training services provided relative to completion rates. The team report indicated that there was no defined completion tracking policy for the ABE/ESL program.

The institution provided in its response a policy for the ABE/ESL program which was added to its policy manual. However, the Commission noted upon review that this policy appeared to be a policy for student progress, as it provided information about how students are assessed and how they progress to the next level. It did not provide information on what constituted a completer of the ABE/ESL program, how completers of this program are tracked, how often the completion rate is calculated and assessed, and who is responsible for this process. Therefore, the institution has failed to demonstrate that the process for documenting and assessing completion rates for the ABE/ESL program is guided by written policies and procedures to ensure systematic and effective implementation of this process in practice over time as required by this standard.

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.

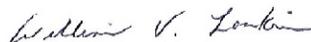
In the case of an appeal, a written statement, plus six (6) additional copies regarding the grounds for the appeal, saved as **PDF documents and copied to individual flash drives**, must be submitted to the ACCET office within sixty (60) calendar days from receipt of this letter. The appeal process allows 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
- 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.

Sincerely,



William V. Larkin, Ed.D.
Executive Director

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CC: Mr. Herman Bounds, Chief, Accreditation Division, USDE (aslrecordsmanager@ed.gov)
Mr. Louis Farrell, Director, SEVP (louis.farrell@ice.dhs.gov)
Ms. Katherine Westerlund, Certification Chief, SEVP
(Katherine.H.Westerlund@ice.dhs.gov)
USDE Accredited Schools Directory (AccreditedSchoolsList@westat.com)