



December 13, 2013

VIA FEDERAL EXPRESS & EMAIL  
(cydiscovery@yahoo.com)

Mr. Chul Kyu Hwang  
President  
Discovery School  
539 Durie Avenue  
Closter, NJ 07624

***Re: Initial Accreditation Denied  
(Appealable, Not a Final Action)  
ACCET ID #1389***

Dear Mr. Hwang:

This letter is to inform you that, at its December 7, 2013 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny initial accreditation to Discovery School, located in Closter, New Jersey with a branch campus in Palisades Park, New Jersey.

The decision was based upon a careful review and evaluation of the record, including the institution's Analytic Self-Evaluation Report (ASER) and Branch Analytic Self-Evaluation Report (BASER), the on-site visit team reports (visits conducted October 8-11, 2013), and the institution's responses to those report, dated November 22 and November 26, 2013. It is noted that one of the weaknesses cited in the team reports was adequately addressed in the institution's responses 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 I-A: Mission Statement (Closter and Palisades Park)

The institution failed to demonstrate that it clearly states its mission and makes it public. The team reports for both Closter and Palisades Park indicated that the mission did not reflect the intentions of the institution as it did not mention the teaching of English, nor were students and staff knowledgeable of the institution's mission.

The institution's response provided a revised mission that more accurately reflects the purpose of the institution as offering an English as a second language program. The institution also provided attestations of students and faculty to demonstrate that the new mission had been reviewed; however, the attestations provided do not include the actual mission being reviewed, nor do the attestations provided encompass the entire population of the Closter and Palisades Park campuses. Instead, the institution provided one instructor and one student attestation for

Palisades Park and two student attestations for Closter. The Commission noted that attestations for Closter were labeled as one instructor and one student, but both indicated that they had “discussed this content with my instructor.” Further, the institution provided no additional information to demonstrate how the institution will measure the meeting of its new mission. Therefore, the institution failed to demonstrate systematic and effective implementation of the institution’s revised mission statement.

2. Standard I-B: Goals (Closter and Palisades Park)

The institution failed to demonstrate that broad institutional goals are clearly stated, support the mission, and are understood at all levels of the organization. The team reports indicated that while the institution had broad institutional goals, there was no documentation to demonstrate how these goals had been selected, or how the goals were communicated. Further, the institution could not validate that goals were communicated to students during the enrollment process or thereafter, as stated in the institution’s ASER.

The institution’s response indicated that the senior management team had collaborated to determine the institutional goals as submitted in the ASER, but did not provide evidence of this collaboration or a policy and procedure to guide further review and revision of the institution’s goals. The institution provided four attestations (two instructors from the Closter campus and one instructor and one student from the Palisades Park campuses) indicating that the goals had been discussed. The Commission also noted, upon review of the institution’s goals, that one goal is to “provide activities that support employer satisfaction with student competency in the English language.” As an Intensive English Program provider, whose students are mostly F-1 visa holders unable to secure employment in the United States, this goal does not support the mission, or comply with federal regulations. Therefore, the institution failed to demonstrate systematic and effective implementation and communication of its institutional goals as they relate to the institution’s mission.

3. Standard II-A: Governance (Closter and Palisades Park)

The institution failed to demonstrate that the management structure ensures the integrity and effectiveness of the institution and its compliance with statutory, regulatory, and accreditation requirements. The team reports indicated that the institution was advertising an additional campus in New York City not included in the institution’s ASER. The team was told that the branch was no longer open, but it was later discovered that campus to be operational, offering test preparatory courses and enrolling students using visas under the main campus’ I-20 authorization. Additionally, the team noted that the senior management responsible for faculty recruitment and retention as well as academic development have limited experience in an English as a Second Language environment. The team also noted a number of programs advertised that were not offered, while others were not included in the institution’s application for accreditation. Further, no written policies were provided relative to enrolling and maintaining international, non-immigrant, F-1 visa holders. Additionally, the main campus and the branch campus currently operate under two different fiscal years, making it difficult to

understand the institution's accurate financial standing. The team noted that while the institution states that it offers 216 hours across a twelve-week sessions, equaling 18 hours per week for the ESL program, the institution's transcripts reflect 16 hours per week, which does not meet the minimum SEVP requirement. The team at the branch campus further noted that one class observed has 104 students scheduled, yet only two were in attendance, and were not of the same level proficiency. Only one class with one instructor was scheduled for the Thursday afternoon timeframe, yet it is noted by the team that not only is it educationally impossible but physically impossible to fit 104 students into one classroom at the branch campus.

The institution's response indicated the institution's old website which included outdated program listings was not the website currently in use; however, the Commission attempted to open the institution's new website and found that [www.discoveryenglish.org](http://www.discoveryenglish.org) did not exist. The institution also indicated that the New York City branch has been dissolved and was not part of the institution's application, but failed to address why students at that campus were using the I-20 issued by Discovery Schools. The institution indicated that in order to address the team's concern relative to management's qualifications regarding oversight of the ESL program, it has promoted "Ms. Won" to Chairperson/advisor of ESL; however, no documentation was provide to evidence implementation of her new responsibilities. Regarding the 18 hour requirement, the institution's response indicated that is has adopted a 4.5 hour Monday-Thursday class schedule, yet the class schedule provided does not evidence 4.5 hours of classroom instruction per day, nor does it demonstrate systematic and effective implementation of an 18 hour week for all full-time students enrolled. The institution also indicated that additional policies and procedures relative to SEVIS compliance were attached as part of the response; however, no attachment was included. The institution failed to address the additional issues cited at the branch campus. Therefore, the institution failed to demonstrate compliance with statutory, regulatory, and accreditation requirements

4. Standard II-C: Personnel Management (Closter and Palisades Park)

The institution failed to demonstrate that management develops, implements, and maintains written policies and procedures for the systematic and effective recruitment, selection, hiring, and retention of all personnel, and failed to demonstrate that management provides orientation, supervision, evaluation, and training and development of its employees to ensure that qualified and capable personnel, at appropriate staff levels, are effectively utilized. The team report indicated that there were no policies and procedures provided relative to employee evaluations, and that only recent instructor evaluations were provided; that personnel paperwork was incomplete, indicating that I-9s were incomplete and missing signatures. Additionally, some 10 99 contract employees (most instructors) had completed a W4 rather than a W9. Additionally, the team noted that a number of faculty had advanced degrees and ample experience in TESOL, but were not utilized for curriculum review or revision.

The institution's response indicated that performance evaluations have been completed, yet only two evaluations were provided. The Commission notes that these two examples do not demonstrate constructive feedback. By way of example, S. Won is noted as exceeding

expectation in all categories and lacks any additional comment. The institution further provided three examples of completed paperwork; one I-9, one W-9, and one W-4; however, the institution failed to demonstrate that all employees across both campuses have complete and valid personnel paperwork. The institution did not address the team's concern relative to experienced faculty not being utilized in the curriculum review and revision process. Further, the institution failed to provide written policies and procedures to govern the paperwork process relative to personnel records or the evaluation procedure. Therefore, the institution failed to demonstrate systematic and effective implementation of personnel policies relative to management, evaluation and appropriate staffing.

5. Standard II-D: Records (Closter and Palisades Park)

The institution failed to demonstrate that the institution has an organized record-keeping system that ensures all records are maintained in an accurate, orderly, and up-to-date manner. The team reports indicated that nearly all student files were incomplete (e.g. missing grades, attendance, signed applications, admissions information). Additionally, none of the student files contained placement or exit tests.

The institution's response indicated that student files are now up-to-date. It provided copies of checks to evidence that the institution has kept these in a separate file; however, only two checks were provided in the institution's response; the check from Yonghee Won was included three times (twice labeled under a different name). The institution further provided copies of two completed placement tests and two completed enrollment agreements; however, these examples fail to demonstrate that all student files are complete. Therefore, the institution failed to demonstrate that it has systematically and effectively implemented an organized record-keeping system that ensures all records are maintained in an accurate, orderly and up-to-date manner which can only be demonstrated in practice over time.

6. Standard II-F: Professional Relationships (Closter and Palisades Park)

The institution failed to demonstrate that it establishes relationships with other organizations within the education and industry network that are maintained, utilized, and documented for the purpose of enhancing the quality of the education, training, and student services. The team reports indicated that aside from industry affiliation with SEVIS and ongoing dialogue with outside organizations, none of the faculty, staff, or senior management were members of TESOL International, NAFSA, or a regional NAFSA or TESOL affiliate.

The institution's response indicated that it has required all staff to provide proof of membership in at least one ESL association or organization by January, 2014. The institution provided an NJTESOL application completed for Mr. James Catalano. The institution failed, however, to demonstrate that it has established relationships with these industry organizations and therefore was unable to document their use in enhancing the quality of education, training, and student services. Therefore, the institution failed to demonstrate compliance with this standard.

7. Standard III-B: Financial Procedures (Closter and Palisades Park)

The institution failed to demonstrate that tuition charges are applied fairly and consistently; that receipt of tuition payments and other monies is properly recorded and tracked; and that cancellation and refund policies are written, fair and equitable; are consistently administered; and comply with statutory, regulatory, and accreditation requirements. The team reports indicated that the institution did not provide evidence of a published tuition schedule nor did it have a refund calculation worksheet that clearly indicated student's start date, last day of attendance, date of determination or a clear mathematical calculation of how the refund was determined. Additionally, the newly written refund policy is not compliant with ACCET Documents 31.ESL – Cancellation and Refund Policy, as students are required to study the first 12 weeks and if not, no refund is given.

The institution's response included a revised cancellation and refund policy, a list of refunds made including three students, and provided a copy of one completed refund calculation form for a student at the Palisades Park campus; however, while the policy is compliant with ACCET Document 31.IEP, the explanation and computation form are based on ACCET Document 31. Therefore, the one refund calculation provided is incorrect, and is also missing necessary documentation, such as an enrollment agreement, written withdrawal form, and evidence of payment, to demonstrate compliance. Further, the institution did not address the team report's weakness relative to published tuition charges. Therefore, the institution failed to demonstrate that the institution's tuition and cancellation and refund policies are compliant and systematically and effectively implemented which can only be demonstrated in practice over time.

8. Standard IV-A: Educational Goals and Objectives (Closter and Palisades Park)

The institution failed to demonstrate that its programs and courses have appropriate educational goals and objectives, that curricular content and learning experiences are preplanned and present a sound, systematic, and sequential educational methodology, or that sufficient and appropriate knowledge and skill elements are included to ensure adequate preparation for the expected performance outcomes in the specific program or course for which the students enroll. The team reports indicated that course objectives as stated in the syllabus are broad and do not address the specific objectives to be taught in each session. The syllabus did not include measurable performance objectives relative to grammar, writing, reading or other components of the curriculum. Further, students did not have copies of the course syllabus and the instructor at the Closter campus indicated that she had not distributed it. The Palisades Park team report indicated that an additional two-hour block of time had recently been added to the students' required hours; however no formal lesson plan or curricula was provided to demonstrate preplanned, systematic and educationally sound curricular content.

The institution's response indicated that it had attached attestations from instructors and students verifying that they received a syllabus on the first day of class; however, the attachments provided (from one student and one instructor) indicated that they had received a copy of the institutional goals and objectives, not a course syllabus. Further, the sample lesson plans provided in the institution's response do not represent a complete curriculum. Therefore, the institution failed to demonstrate that it has systematically and effectively implemented appropriate educational goals and objectives, supported by curricular content and learning experiences that are preplanned and present a sound, systematic, and sequential educational methodology which can only be demonstrated in practice overtime.

9. Standard IV-C: Performance Measures (Closter and Palisades Park)

The institution failed to demonstrate a sound, written assessment system that contains a set of defined elements, such as grading scale, weighting factors, tests, quizzes, reports, projects, attendance, and participation, that are appropriately related to the performance objectives of the program or course. The team reports indicated that the institution had no placement test, nor outside exit test to validate a student's proficiency. The school could not provide any completed student mid-term tests as required by ACCET Doc. 18.IEP – Student Progress Policy for courses of four weeks or longer. Further, the school couldn't provide any sample grading form or explanation as to how grades are communicated to the administrative staff to be entered into the electronic grade report.

The institution's response indicated that mid-term examinations are completed and were available to the team in a separate folder; however, the response included only two (one from each campus) sample mid-terms examination cover sheets. Further, the response included only two scored placement tests and no evidence of an outside external proficiency test. A policy guiding the process for instructors to provide grades to administrative staff was included, but no completed grade forms were submitted to evidence the implementation of the institution's performance measurements in practice. Therefore, the institution failed to demonstrate systematic and effective implementation of its written assessment systems in practice over time.

10. Standard IV-D: Curriculum Review and Revision (Closter and Palisades Park)

The institution failed to demonstrate that it uses systematic and effective procedures to continuously monitor and improve the curriculum. The team reports indicate that the institution's ASER noted that the curriculum is reviewed annually, yet there was no policy provided that included a time frame for curriculum review and revision.

The institution's response indicated that revision can take place "as necessary," and that the curriculum review and revision policy is part of their Operational Policies manual. The institution indicates that although the review of curriculum takes place annually, this represents the most time that will surpass before review takes place. However, the institution did not provide a copy of the policy indicating at least an annual review for curriculum and did not provide documentation to evidence such reviews had taken place. Therefore, the institution

failed to demonstrate systematic and effective implementation of a revised curriculum revision and review process which can only be demonstrated in practice over time.

11. Standard V-A: Instructional Methods (Closter and Palisades Park)

The institution failed to demonstrate that its instructional methods encourage active and motivated responses from participants that provide encouragement, motivation, challenges, and learning opportunities for all participants, taking into account different backgrounds, learning abilities and styles, and prior levels of achievement. The team reports indicated that while teachers follow the curriculum, the methods and activities observed by the team did not encourage student participation and did not allow for both advanced and remedial students to participate. A large amount of instructor talk time and the lack of pair work or student-to-student communication made some students in each class appear disengaged. It was noted that at the main campus, one instructor translated difficult words and phrases into Korean several times, yet not all students in class spoke Korean. Further, as noted in the Palisades Park branch campus team report, teachers taught sitting down, making little use of body language, pictures, or audio visuals. The team observed many instances of a failure to check for understanding. Often the instructors concentrated on the book and failed to engage the students with real life examples.

The institution's response indicated that they are exploring a variety of methodologies to enhance teaching and learning, but failed to provide any evidence of instructor training, evaluation, or development. Therefore, the institution failed to demonstrate systematic and effective implementation of appropriate instructional methods which can only be demonstrated in practice over time.

12. Standard VI-A: Qualifications of Instructional Personnel (Closter and Palisades Park)

The institution failed to demonstrate that instructional personnel meet all relevant accreditation, and industry-specific requirements. The team reports indicated that the institution could not provide evidence of a clearly defined instructor hiring policy, or required qualifications for instructors. Further, two instructors at the Palisades Park branch campus (Worthington and Ji Youn Kim) did not meet the minimum ACCET requirements for ESL classroom instructors.

The institution's response included a copy of the newly created policy for hiring instructional faculty; however, the policy does not include minimum qualifications as required by the ACCET standard. Further, the institution did not address the qualifications of the instructors noted at the branch campus who did not meet ACCET minimum requirements. Therefore, the institution failed to demonstrate that all faculty meet ACCET's qualification requirements as required by this standard.

13. Standard VI-B: Supervision of Instruction (Closter and Palisades Park)

The institution failed to demonstrate that individuals with relevant education and experience in instructional delivery and management supervise instructional personnel; that supervisors of instructional personnel demonstrate good practice in the evaluation and direction of instructors; and that regular classroom observations, along with student, peer, and supervisory feedback are documented and effectively utilized to enhance the quality of instruction. The team reports indicated that the senior managers responsible for supervision of ESL instruction did not have the requisite background or experience in the field of education. Further, no formal and consistent evaluations of instructors were available.

The institution's response indicated that they promoted an ESL instructor, Ms. Won, to be part of the management team. A resume and job description were provided indicating instructor evaluations as part of her responsibilities. However, only one instructor performance evaluation was provided as an exhibit under Standard II-C: Personnel Management. This evaluation is for Ms. Won completed by Dr. Catalano and, as mentioned under that standard, the evaluation is checked off as exceeding expectation in all categories and lacks any additional comment, construction feedback, guidance or direction. Therefore, the institution failed to demonstrate systematic and effective implementation of a sound process for supervision of instruction that demonstrates good practice in the evaluation and direction of instructors which can only be demonstrated in practice over time.

14. Standard VI-C: Instructor Orientation and Training (Closter and Palisades Park)

The institution failed to demonstrate that it develops and implements an effective written policy for the ongoing professional development of instructional personnel that is systematically implemented, monitored, and documented. The team reports indicated that instructor files did not show any evidence of outside professional development.

The institution's response indicated that it is providing in-house professional development for all instructors currently and that an outside professional development workshop is planned for December 2013. However, the institution did not provide any documentation in the way of agendas, minutes, attendance, or schedule relative to the in-house professional development taking place at either campus nor could they demonstrate participation in the scheduled December workshop. Therefore, the institution failed to demonstrate the systematic and effective implementation of ongoing professional development of instructional personnel.

15. Standard VII-A: Recruitment (Closter and Palisades Park)

The institution failed to 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, programs, costs, location, instructional personnel, student services, outcomes, and other benefits. The team reports indicated that the institution's website includes superlative claims that cannot be justified; "The Best Language



School in the U.S.A.!” The website also included a New York City campus as one of its branches and listed programs not included in the institution’s application; GRE, GMAT, and Art Portfolio+TOEFL. Further, the website states “Discovery will be pleased to arrange accommodations for our international student” with a placement fee \$150; however, in interviews with senior management concerning student services, they stated that they do not provide housing for students. The website also referred to a list of teachers and staff; none of whom appear on any org chart or personnel checklist. The current staff and faculty are not listed. It also referred to teachers of mathematics, chemistry, and math, yet there are no courses of these subjects offered by the school. A review of promotional printed material included a Materials and Technology Fee of \$60, indicating that, "you have a unique curriculum that includes exclusively proprietary textbooks," yet the curriculum consists of standard published ESL textbooks available on the open market.

The institution’s response indicated that the website reviewed by the team is an old website and provided a new web address for reference. However, as noted in Standard II-A: Governance the new website does not work. Further, the institution failed to address any of the item noted in the team report. Therefore, the institution failed to demonstrate that informational and promotional materials, advertising, and representations made by the institution include justifiable and provable claims as required by the standard.

16. Standard VII-B: Enrollment (Closter and Palisades Park)

The institution failed to demonstrate that the enrollment process is preplanned, effective, and regularly monitored by the institution to ensure its integrity. The team reports indicated that the institution’s application, which serves as the enrollment agreement, does not include the refund policy. Enrollment agreements reviewed by the team were either incomplete, inaccurate, or not signed by the required two parties. By way of example: Seoha Lee’s application did not indicate the program of enrollment and was not signed by the student; Sohee Lee’s application did not indicate the program of enrollment, fee amounts were left blank, and the agreement was not signed; Shinn Jungmin’s Financial Affidavit of support was not notarized; Amin Mohamed Ahmed ElSayed’s application did not indicate which campus the student was attending; and Kwang Sik An’s application did not have a signed credit card authorization.

The institution’s response indicated that it has revised its enrollment agreement and that it “addressed the incomplete student files.” The institution provided two copies of completed application forms and completed student file checklists (one from each campus), but these forms are not for the students mentioned in the ACCET team reports and no other documentation was provided to demonstrate an effective and accurate process. Therefore, the institution failed to demonstrate a consistent, effective, and regularly monitored enrollment process which can only be evidenced in practice over time.

17. Standard VII-D: Student Services (Closter and Palisades Park)

The institution failed to demonstrate that student services, consistent with the mission and learning objectives of the institution, are provided, such as academic advising, tutoring, extracurricular activities, and housing. The team reports indicated that the institution could not provide evidence of student services offered.

The institution's response indicated that all student services are listed on the institution's new website. As noted previously, the institution's new web address ([www.discoveryenglish.org](http://www.discoveryenglish.org)) does not work. The institution did not provide any documentation or narrative to address the student services offered to current students. Therefore, the institution failed to demonstrate that any student services are provided as required by the standard.

18. Standard VIII-A: Student Progress (Closter and Palisades Park)

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. The team reports indicated that a number of student did not take final exams in the past quarter, yet it was unclear how the grades for those students were calculated as the final exam is worth 35% of the students final grade. The reports indicate that the institution's progress policy does not include quantitative measures, nor does it address consequences of failure to meet satisfactory progress standards. Further, the Palisades Park team report noted two students currently in level 103 who had failed their prior level's final exam, scoring a 64% and a 47%, but were still advanced to level 103.

The institution's response indicated that is has revised its satisfactory progress policy and provided a copy as published in the student handbook. However, no documentation was provide to demonstrate implementation of this revised policy. The institution did not provide an explanation of the calculation of grades for those students who missed their final exam, nor did they provide an explanation as to the advancement of student having failed their final exam. Therefore, the institution failed to demonstrate the systematic and effective implementation of the institution revised satisfactory academic progress policy which can only be evidenced in practice over time.

19. Standard VIII-B: Attendance (Closter and Palisades Park)

The institution failed to demonstrate that it establishes and implements 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 the course or program. The team reports indicated that the school's policy of excused absences does not ensure that all students are held to the attendance requirement of 80%. Further, the school does not have a written vacation policy, but in practice

allows students multiple vacations of varying lengths. The team reviewed attendance records and found no evidence that late arrivals or early departures had ever been recorded.

The institution's response indicated that it has revised its leave of absence policy, but failed to provide any documentation to evidence its implementation. The institution indicated that it has been using a new, electronic finger printing system to track when students arrive at the institution; however, no documentation was included to evidence implementation of this new system. No attendance records were provided. Further, the institution did not address the team's concern relative to early departures and late arrivals, or the use of excused absences. Therefore, the institution failed to demonstrate that it implements and monitors a sound attendance policy which can only be evidenced in practice over time.

20. Standard VIII-C: Participant Satisfaction (Palisades Park)

The institution failed to demonstrate that written policies and procedures are followed that provide an effective means to regularly assess, document, and validate student satisfaction relative to the quality of education and training offered, as well as the student services provided. The Palisades Park branch campus reports indicated that there was no policy or procedure in place to direct the regular analysis of and reaction to student satisfaction surveys.

The institution's response indicated that all student satisfaction surveys are reviewed by the Campus Director and then discussed with the President. The institution indicated that concerns that are identified by students are addressed immediately, noting that there have yet to be any issues of major concern in which the administration needed to address. The institution did not provide, however, the published policy relative to this review, nor did it provide evidence of summaries or analysis of student surveys prepared or presented to the President. Therefore, the institution failed to provide evidence of systematic and effective implementation of the participant satisfaction review process which can only be demonstrated in practice over time.

21. Standard VIII-E: Completion and Placement (Closter)

The institution failed to 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 Closter main campus team report indicated that there is no written policy to track and analyze completion data.

The institution's response included a written completion tracking policy; however the policy does not include the institution's definition of a completer. It also lacks the procedures necessary to determine an accurate completion rate as it did not include an assessment of the number of students enrolled, completed, withdrawn, transferred or terminated, nor does it include a time period for evaluation. Therefore, the institution failed to demonstrate systematic and effective implementation of a written completion policy as required by the standard.

Since denial of initial accreditation 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](http://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.


In the case of an appeal, a written statement regarding the grounds for appeal, saved as PDF documents (with exhibits bookmarked) and copied to six 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.

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.

Initial applicants are advised that, in the instance of an appeal following a denial of accreditation being initialized in accordance with ACCET policy, the institution may not make substantive changes to its operations, such as additional programs or sites, until a notice of final action is forwarded by the Commission.

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

C: Ms. Kay Gilcher, Director, Accreditation Division, USDE ([aslrecordsmanager@ed.gov](mailto:aslrecordsmanager@ed.gov))  
Mr. Louis Farrell, Director, SEVP, DHS/SEVP ([louis.farrell@ice.dhs.gov](mailto:louis.farrell@ice.dhs.gov))  
Ms. Katherine Westerlund, Certification Chief, SEVP, DHS/SEVP  
([Katherine.H.Westerlund@ice.dhs.gov](mailto:Katherine.H.Westerlund@ice.dhs.gov))