



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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December 13, 2013

VIA eMAIL
(wsand@wbcs.edu)

Mr. Warren Sander
Chief Financial Officer
Lingua Franca Institute
at Washington Baptist University
4300 Evergreen Lane
Annandale, VA 22003

***Re: Initial Accreditation Denied
(Appealable, Not a Final Action)
ACCET ID #1411***

Dear Mr. Sander:

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 Lingua Franca Institute at Washington Baptist University, located in Annandale, Virginia.

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 September 10-12, 2013), and the institution's response to that report, received October 25, 2013. It is noted that several weaknesses cited in the team report were 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 I-B: Institutional Goals; I-C: Planning

The institution did not demonstrate that broad institutional goals support all aspects of the mission and are understood at all levels of the organization. The same was noted for the short-term business plan, which included only academic objectives.

The team report indicated that institutional goals concerned only the institution's academic philosophies and reflected no consideration in the planning process of business-oriented objectives. The institution responded that it had not made clear in the information presented to the team how the planning process for the institutional entity recognized by ACCET (i.e. Lingua Franca Institute, LFI, or "the institution") is only a portion of a larger process belonging to the parent entity, Washington Baptist University (WBU) and exhibited additional planning documents to illustrate this fact. However, the documents provided as exhibits as part of the response to Standard I-C: Planning, the institution addresses long-term goals relative to LFI and

did not address the cited weakness of broad institutional business-oriented goals distinct from the academic philosophical goals presented in the ASER specifically for 2012-2013. Therefore, the institution has not demonstrated systematic and effective implementation of all institutional goals used to inform a planning process that will provide for the complete needs of the institution.

2. Standard II-A: Governance

The institution failed to demonstrate that the senior management structure ensures the integrity and effectiveness of the institution and its compliance with statutory, regulatory, and accreditation requirements.

The team report indicated several problems concerning the institution's site in Columbia, Maryland, listed in its application for accreditation as an auxiliary classroom. The institution had not been able to register this site as a branch due to various difficulties effectively communicating with the SEVP. Both the team and the Commission considered this a serious breach of SEVP policy, as the Maryland site enrolls students and takes payments. In addition, ACCET policy precludes auxiliary classrooms from providing enrollment activities and student support services such as counseling or placement, yet the institution allows students to complete applications at its Columbia location, and placement exam administration, student orientation, and student attendance and academic counseling all occur there. One student interviewed by the team stated that she had never been to the Annandale campus. The institution could evidence neither Maryland state licensure or a letter of exemption from licensure. The team also noted inadequacies in the institution's Leave of Absence (LOA) Policy and process for documenting LOAs, resulting in the team's inability to verify whether past LOAs had been administered in compliance with both ACCET and SEVP policy.

While the institution's response included an update on the status of the Columbia site and clarified a misunderstanding regarding identity of the PDSO, it failed to demonstrate that the still-operational campus is yet registered correctly in SEVIS or that the institution's use of that system and communications with SEVP officials is fully effective, and the Commission found little assurance in the institution's response. No Maryland license to operate the campus, exemption letter, or evidence of application was provided, only a certificate of corporate registration. The institution provided several examples of how administrative processes cited by the team are actually completed at the main campus, even though all interaction with the student associated with these processes occurs in Columbia. No supporting evidence was provided to substantiate these claims, and in themselves they do not effectively negate the team's citation. Regarding LOA's, the response discussed revised procedures, but provided no supporting documentation to demonstrate compliance. The Commission noted that a single case file was referenced in the narrative response, but does not appear among the exhibits. Therefore, effective implementation of revised policies and observable results of effective management were not in evidence to demonstrate the institution's compliance with statutory, regulatory, and accreditation requirements.

3. Standard II-B: Operational Management

The institution did not demonstrate that written policies and procedures guide the day-to-day operations of the institution.

The team report indicated that neither the WBU operations nor employee handbooks make specific reference to LFI staff and programs. In its response, the institution demonstrated that WBU HR policies embodied in the "Staff Handbook 2013-14" are equally applicable to all employees, including LFI employees. The response indicated that it had separate academic policies and procedures relative to the management of the ESL program and provided a copy of that handbook in response to the weakness cited under Standard IV-A: Educational Goals and Objectives. Not included in the response were acknowledgement sheets or faculty meeting minutes where the handbook policies and procedures were discussed to evidence that this new handbook has been distributed to all faculty and that its policies and procedures have been implemented. Therefore, the institution has failed to demonstrate that it has systematically and effectively implemented organized, written policies and procedures to direct those processes.

4. Standard II-C: Personnel Management

The institution failed to demonstrate that management provides supervision, evaluation, and training and development of its employees to ensure that qualified and capable personnel, at appropriate staffing levels, are effectively utilized.

The team report indicated that staff training days had not occurred in the last two years. Such in-service training days are scheduled every six months, upon completion of which employees receive a certificate for participation; however, no evidence of teachers actually participating in staff training was available. Employee evaluations had taken place every other year, not every year as stated in the ASER, and no evaluations from 2013 were presented to the team. The institution's response included copies of training day agenda for the last three years. However, no minutes, sign-in attendance sheets, certificates, or any other form of documentation to evidence participation by a majority of the faculty and staff was in evidence. The response confirmed that 2012 employee evaluations had been postponed until 2013, at which point they were reportedly completed, yet only two evaluations from 2013 were presented as supporting documentation. In addition, a single certificate documenting participation by one staff member in an outside training/professional development event from 2011 was provided. Therefore, the institution has failed to demonstrate systematic and effective implementation of training and supervisory procedures which can only be evidenced in practice over time.

5. Standard II-D: Records

The institution failed to demonstrate an organized record-keeping system that ensures all records are maintained in an accurate, orderly, and up-to-date manner that facilitates ready access and review of those records by appropriate parties.

The team report indicated widespread inconsistencies and incomplete files among the institution's hard copy filing system. Some pertinent information, such as the "Written Pledge" and a document confirming receipt of immigration information are recorded only in Korean, which neither complies with ACCET policy nor ensures that all students, including LFI's non-Korean-speaking students, are signing consistent versions of documents that they understand. While the institution's response addressed one of the individual case files cited as an example by the team, it described no review of recordkeeping procedures and no retraining of staff in order to suggest that the systemic "workflow" shortcomings have been addressed. No supporting documentation was offered. The response stated that all files have been completed in English only since Fall 2012, but it provided neither policy to that effect nor any recent, English-language copies of the two documents mentioned by the team. The response stated that "the team's observation does not represent a weakness in the integrity of the file, but the work flow management process of maintaining the files," which management proess the institution promised to improve. No actual corrective actions were detailed, and the Commission does not understand how the institution's characterization in any way mitigates the impact of the cited weakness. Therefore, The Commission determined that effective implementation and observable results were not in evidence.

6. Standard III-B: Financial Procedures

The institution did not demonstrate that cancellation and refund policies are consistently administered and comply with statutory, regulatory, and accreditation requirements.

The team report indicated that the institution's refund policy does not comply with ACCET Document 31.ESL. While the institution's response related the provisions of a new policy that appears to satisfy the requirements of the ACCET document, no evidence was provided to show the new policy is being applied correctly and consistently for students who actually withdrew. Therefore, the institution has yet to demonstrate systematic and effective implementation of refund policies and procedures, which can only be evidenced in practice over time.

7. Standard IV-A: Educational Goals and Objectives

The institution failed to demonstrate that the curricular content and learning experiences are preplanned and present a sound, systematic, and sequential educational methodology.

The team reported that the institution provides syllabus guidelines to instructors during the orientation for each semester or term that contain the essential elements needed for each instructor to construct a syllabus: performance objectives, course book, assessment system, expectations and assignments, grading rubric and grading scale, attendance policy, academic honesty statement, important dates and classroom rules, along with a sample completed syllabus. However, the team could not verify that this process is completed for the J-Term program. One instructor reported that he had not been provided with syllabus guidelines for the most recent J-Term program and had created his own content as the course progressed. The institution failed to address this weakness except by stating that all information

contained in its Teacher Handbook is equally applicable to all courses in all programs; no evidence of J-term syllabus preparation was included. Further, the Commission could not determine that all information necessary to complete the process described above is actually available in that publication. Therefore, the institution has failed to demonstrate systematic and effective implementation of its policies and procedures relative to the development of course syllabi.

8. Standards IV-B: Program/Instructional Materials and VI-B: Supervision of Instruction

The institution failed to demonstrate that texts demonstrate the appropriate scope, sequence, and depth of each program or course in relation to the stated goals and objectives; that individuals with relevant education and experience in instructional delivery and management supervise instructional personnel; or that regular classroom observations are documented and effectively utilized to enhance the quality of instruction.

The team reported that the institution's specified text books did not consistently align with the prescribed communicative methodology, performance objectives, and proficiency levels, even though the institution recently mapped the performance objectives to the text books. Numerous examples were cited. The team report further stated that, in its statements to the team, the institution made clear that it relies heavily on the skill of its more experienced instructors to compensate in the classroom for this misalignment of texts and objectives. However, in this regard the team also reported that there is no regular oversight to ensure that this actually occurs as intended, since teachers do not submit lesson plans or lesson reports, are observed only annually, and since the director responsible for all academic supervision does not possess any formal training in TESOL, education, or curricular development in order to effectively manage instructors. In its response, the institution indicated that the Curriculum Design Committee (CDC) has established a process in which teachers will report a summary of their weekly activities – the textbook unit and pages completed, the supplemental exercises used, the communicative activities implemented, as well as the teacher's comments on activities and students' language development – to the CDC chair, currently one of the most experienced teachers among the faculty. However, this new process still does not provide for more frequent classroom observations by a qualified supervisor, which are clearly required. Moreover, the Commission noted that the proposed system was still in development as of the response submission. Therefore, the institution has failed to demonstrate systematic and effective implementation of an educationally sound oversight process for faculty, which can only be evidenced in practice over time.

9. Standard IV-C: Performance Measurements

The institution did not demonstrate that it has 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 report indicated that only 30% of the final grade is based upon actual assessment of English language proficiency, while the remaining 70% is based on attendance, ungraded homework, and participation. Review of students' academic files revealed that instructors had not consistently or accurately calculated cumulative grades, revealing misapplication of the institution's policy for factoring attendance performance into the quantified grade, among other aberrations. The report cited multiple examples. While significant portions of a student's total course grade is based on participation and classwork, no rubrics existed to encourage uniform standards for assessment, and faculty interviews revealed varying definitions of "classwork." Similarly, the institution did not provide instructors with guidelines or rubrics to encourage consistent grading of the speaking portions of the mid-term and final exams. Finally, the team reported counter-intuitive choices of test items, such as questions for the Oral Communication exams that were not consistently speaking and listening questions, even though speaking and listening are the focus of the course in question, and in spite of the fact that the institution provided guidance in the form of a questions pool from which at least 50% of exam items must originate. In its response, the institution provided copies of new rubrics for assessing classwork and participation, but no documentation was submitted to demonstrate their systematic and effective implementation. An email to several instructors was provide addressing the creation of Oral Communications exams, but the Commission was unable to determine how instructions in that email differed from the status quo reported by the team. The response also described two new systems for automating the creation of grade reports, one immediate and one for future implementation. While faculty meeting minutes were provided showing discussion of these new measures, the institution's response failed to demonstrate that the institution has implemented systematic and effective measures to objectively assesses its students' English language performance.

10. Standard IV-D: Curriculum Review/Revision

The institution failed to demonstrate that it uses systematic and effective procedures to continuously monitor and improve the curriculum.

The team report indicated that the institution did not have a written policy or procedure for curricular review. Additionally, the institution's ASER indicated that a template for the comprehensive curriculum review was under development, which the team was unable to review. The response provided a written policy directing an annual review of textbook choices and a more thorough, course-by-course curricular review on a three-year schedule. The "template" was also provided, being a portion of the policy document dictating a rotational 3-year schedule of review for different courses. However, the Commission was unable to establish systematic and effective implementation based on the short record of review and revision currently on record, including implementation of the rotating course review dictated by the template page, which can only be evidenced in practice over time.

11. Standard V-A: Instructional Methods

The institution failed to demonstrate that instructional methods encourage active and motivated responses from participants; that the instructional methodology is consistent with

current training industry standards and appropriate to the educational goals and curricular objectives, facilitates learning, and serves the individual learning needs and objectives of participants; or that procedures are in place to ensure that the curricula are followed and that there is consistency of application by all instructional staff.

The team report indicated that, although the institution's prescribed methodology is the communicative method, this was not consistently observed in classrooms. One instructor observed at the main campus demonstrated little understanding of communicative methodology and common best teaching practices, and three of this instructor's students expressed dissatisfaction with instruction at the institution. The classes observed at the main campus had very little variation in the types of activities provided to students, while classes at the auxiliary classroom showed a high degree of variation in activities. The institution's response failed to address any of these concerns. Consequently, systematic, effective, and consistent implementation of the prescribed communicative methodology has not been demonstrated in practice.

12. Standard VII-A: Recruitment –

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.

The team reported that the institution does not consistently market itself as “Lingua Franca Institute.” Newspaper advertisements reviewed on site and posters exhibited with the ASER display only the name “Washington Baptist University,” with the institution itself only identified as “ESL” on a program list. Since LFI and the degree programs at WBU have a number of different admissions requirements, it is important that the institution is identified and differentiated on advertising to potential students. The institution's response failed entirely to address this cited weakness. Consequently, the institution failed to demonstrate systematic and effective implementation of procedures to ensure accurate and unambiguous advertising.

13. Standard VIII-A: Student Progress

The institution failed to demonstrate that participants are informed of their progress on a regular and timely basis or that it publishes clear descriptions of their requirements for satisfactory student progress and utilizes sound written policies and procedures to determine student compliance with these requirements.

The team report identified nine individual points by which the institution's Satisfactory Progress policy either contains internal contradictions or is lacking elements required by ACCET Document 18.IEP. Included among these was the following statement: “The director indicated that students who... fall below a C receive an advisory letter.” However, as the institution does not calculate grades until the end of the semester, it does not have the capacity to send out academic advisory letters. In response to this point, the institution

responded that instructors calculate a numerical grade for the mid-term examination required in every course and return it immediately to students; therefore it has the capacity to issue an advisory letter prior to completion of the course. According to the institution's assessment system, the mid-term exam represents only 15% of the total course grade. As such, the Commission remains concerned that this is an inadequate basis for issuing a progress report of any accuracy or significance. The institution's response also included revisions to its Satisfactory Progress policy addressing the other concerns elaborated by the team, including blank examples of mid-term progress reports and learning plans, cited as missing by the team. However, no record is available for review to demonstrate systematic and effective implementation of the revised policy, procedures, and blank form templates in practice over time; consequently, the institution failed to demonstrate compliance with this standard.

14. Standard VIII-B: Attendance

The institution failed to demonstrate written policies and procedures for monitoring and documenting attendance effective in ensuring that student participation and preparation are consistent with the expected performance outcomes of the course or program.

The team reported that the institution does not have a reliable procedure to respond timely to severe attendance problems consistent with its policies. The institution's policy calls for attendance warnings issued to students who have missed 10% of their classes during the semester to date. However, the team reported that attendance is only submitted monthly, meaning that students would have completed 25% of their program before attendance is reviewed. The director informed the team that attendance is also discussed at faculty meetings scheduled during the third week of the month; yet meeting agenda reviewed by the team did not consistently include attendance, and students could still reach 10% absence before the third week. In its response, the institution explained the team's observation as a misunderstanding: "Although we have monthly meeting, the director is informed of student's absences on a daily basis." However, it failed to provide evidence of the daily review of attendance performance. Two emails were provided from teachers informing of particular student absences. While useful, these emails were clearly spontaneous and irregular in nature, and do not in themselves comprise a reliable process for monitoring attendance performance of the entire student body. Similarly, evidence was provided to illustrate the electronic means, via Google Docs, by which instructors at the Columbia classroom record attendance, to which "the director has access... at any point in time." The Commission noted that "having access" to records does not in itself demonstrate an effective, systematic, and reliable process for enforcing attendance standards directed by written procedures. Therefore, the institution has failed to demonstrate compliance with this standard.

15. Standard VIII-C: Participant Satisfaction

The institution did not demonstrate both interim evaluations and a final evaluation upon completion of the term of enrollment, which are specified components of determining participant satisfaction.

The team report indicated that the institution conducts student satisfaction surveys only at the end of each term. Since a student might enroll for only one term, this fails to satisfy ACCET's standard, which also calls for at least an interim evaluation in every program. The institution failed entirely to respond to this cited weakness.

16. Standard VIII-E: Completion and Placement

The institution failed to demonstrate that the quality of the educational programs is validated by the outcomes represented in positive completion results or that effective and systematic policies and procedures are in place for validating completion rates.

The team reported that the institution lacks comprehensive written policy to govern the tracking and calculating of completion rates. The policy provided directs how completion rates are calculated, but did not specify who was responsible for calculating the rates, how often they are calculated, and what is done with the information once it is calculated. The response informed that the Director is responsible for calculating the completion, which fact the team had already noted, at the end of each semester. Results are discussed with the CDC, the Lingua Franca Advisory Chair, and individual instructors to determine why students failed to complete and what larger lessons might be gleaned from their examples. However, no documentation was provided to illustrate the process so described in action, and the written policy and procedure directing such a process on a regular basis is still not in evidence. Therefore, the institution has failed to demonstrate systematic and effective implementation has not been demonstrated.

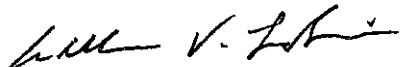
Since denial of initial accreditation is an adverse action by the Accrediting Commission, the institution may appeal the decision. The full procedures and guidelines for appealing the decision are outlined in Document 11 – Policies and Practices of the Accrediting Commission, which is available on our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

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/mln

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