



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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May 4, 2017

VIA EMAIL & FEDERAL EXPRESS
(njsophia0710@gmail.com)

Ms. Sophia Kim, Vice President
Universal English Center
49 W 33rd Street
New York, NY 10001

*Re: Initial Accreditation Denied
(appealable, not a final action)
ACCET ID #1482*

Dear Ms. Kim,

This letter is to inform you that at its April 2017 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny initial accreditation to Universal English Center, located in New York, New York.

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 May 9 - 10, 2016), and the institution's response to that report, dated June 29, 2016, as well as the interim reports received October 28, 2016 and February 23, 2017. It is noted that the original team report included 13 weaknesses, of which 10 remained outstanding at the August 2016 meeting. Seven (7) key areas remained unsatisfactorily addressed at the December 2016 meeting, and the Commission thus voted to defer further consideration until review at the April 2017 meeting and directed the institution to submit an additional interim report to include responses to the remaining items relative to Standards: I-C Planning; II-B Operational Management; III-B Financial Procedures; IV-A, B Educational Goals and Objectives / Instructional Materials; VIII-A Performance Measurements; VIII-B Attendance; and VIII-C Student Progress.

Upon its review at the April 2017 meeting, the Commission determined that the interim report received February 23, 2017 did not adequately address all areas of noncompliance and in some cases raised additional concerns. Specifically, 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-C: Planning

The institution did not demonstrate that it utilizes a planning process, consistent with its scope and size, to establish plans that support the institution's mission and goals or that the plans include methods for subsequent evaluation utilized to measure progress in achieving the established objectives.

In its response, the institution stated its short-term and long-term planning intentions and described what it “will be doing” but failed to provide detailed progress updates or subsequent evaluations for the items listed in both the short-term and long-term plans. The interim report did not provide the requested detailed narrative pertaining to the implementation of short-term and long-term plans nor did the response include subsequent evaluation of the specific items listed in the institution’s planning documents. Specifically, the institution failed to provide updated details relative to the status of the following items: development of professional relationships, establishment of an advisory board, progress of general recruitment efforts, progress of refugee recruitment efforts, the hiring of a Spanish-speaking counselor, and the potential filing of a lawsuit against SEVP, as required.

The institution did not demonstrate that its planning documents are utilized to measure progress in achieving established objectives, as required by the standard and directed in the December 2016 Commission Action letter. Therefore, the institution has not demonstrated compliance with this standard.

2. Standard II-A Governance

The institution did not demonstrate that its management structure consistently ensures the capability to maintain compliance with regulatory and accreditation requirements.

Based on the Commission’s review of the institution’s marketing and informational materials published on its website, it was noted that one version of the Admissions Policy (located at www.universaleenglish.com in the Chinese section) imposed requirements for students seeking to transfer to another school. These requirements are stated as follows: “*TRANSFER OUT – A student who wants to transfer to another school must complete at least 13 weeks (one quarter) of study with passing grades.*” This is not compliant with the Student and Exchange Visitor Program (SEVP) regulations which stipulate that no barriers to transferring to another school can be imposed on students.

Further, it was noted that the institution’s interim report included a revised policy for session duration noted as 10 weeks, yet the Admissions Policy on the website, in the Chinese section, refers to a session duration of 13 weeks, resulting in an inconsistent and unclear program length.

The institution did not demonstrate that all published and implemented policies and program information is consistent and in accordance to federal and ACCET regulations. Therefore, the institution failed to demonstrate compliance with this standard.

3. Standard IV-B Program and Instructional Materials

The institution did not demonstrate that the program materials, including syllabi, lesson plans, instructional guides, and texts cover the appropriate scope, sequence, and depth of each program

or course in relation to the institution's stated goals and objectives.

In its interim report, the institution provided the requested list of the new textbooks selected for each level. The institution indicated that for each of the institution's six proficiency levels, three new textbooks have been selected for *each* of the six levels with the plan to rotate books every ten week session. However, the institution did not provide documentation to demonstrate alignment between the 18 newly implemented textbooks and the institution's curriculum, lesson plans, syllabi and learning outcomes for each level.

While the narrative response included a general statement as follows: "*We like the new books we have chosen for all levels,*" the institution submitted minimal feedback and review for only one textbook that included comments from three students and one teacher. The institution did not submit compiled data or comprehensive feedback from a significant sampling of students and staff covering, at minimum, the three textbooks selected for one level. Further, the institution did not provide sufficient detail as to how the feedback collected (e.g. "*not enough grammar practice*" or "*needs expanded pronunciation section*") is systematically reviewed and addressed.

The institution did not demonstrate that the program materials, specifically the textbooks, adequately cover the appropriate scope, sequence, and depth of each proficiency level in relation to the stated curriculum goals and objectives. Therefore, the institution failed to demonstrate compliance with this standard.

4. Standard VIII-A Performance Measurements (formerly IV-C)

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.

In its interim report, the institution indicated that the grading and testing systems have been revised and that it now uses a midterm and a final exam taken directly from the Teacher's Editions of the newly implemented textbooks, and these assessments comprise the majority of a student's weighted grade. The midterm is weighted at 30%, and the final is weighted at 60% of a student's grade. The remaining 10% is attributed to homework (5%) and participation (5%). The institution further explained that since the midterm and final are directly generated from the tests published in the Teacher's Editions of the textbooks being used in the program, there is direct alignment between the tests and the content covered in ESL classes. However, the institution's revised assessment system heavily emphasizes written test results that do not effectively measure all four language skills, namely Listening and Speaking. While these skills may be indirectly addressed on the written exams, such tests are not an effective or authentic measure of students' Listening and Speaking ability in English and, therefore, these test results do not demonstrate proficiency of all language skills, as outlined in the institution's learning objectives.

The institution did not demonstrate that its current assessment system contains educationally sound, effective, and defined elements to appropriately measure all core performance objectives of its ESL program curriculum. Therefore, the institution failed to demonstrate compliance with this standard.

5. Standard VIII-C Student Progress (formerly VIII-A)

The institution did not demonstrate that its course schedule promotes successful completion of the program or that the institution utilizes appropriate and educationally sound methods to support student performance, attendance, and achievement.

In its interim report, the institution provided its revised Student Handbook as well as Counseling Meeting Minutes. It was noted by the Commission that the institution implements three-week breaks after each ten-week session. This schedule allows for student vacation (or break) up to nine weeks per year and does not demonstrate a commitment to student learning and language proficiency, as this practice interrupts consistent exposure to language instruction and curriculum content thereby potentially impeding student progress.

The institution did not demonstrate that it implements sound educational practices relative to consistent and ongoing training sessions that serve to optimize language exposure and thus result in satisfactory academic student progress. Therefore, the institution has failed to demonstrate compliance with this 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.

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, 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:

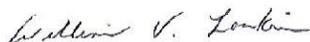
- The only remaining deficiency cited by the Commission in support of a final adverse action decision is the institution's failure to meet ACCET Standard III-A, Financial Stability, with the institution's non-compliance with Standard III-A the sole deficiency warranting a final adverse action.
- The 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.

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.

Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity

Sincerely,



William V. Larkin, Ed.D.
Executive Director

WVL/cc

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