



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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May 2, 2016

VIA EMAIL & FEDERAL EXPRESS
(austin@inlingua.com)

Ms. Brigitte de Roch, Executive Director
inLingua Language Services
3818 Spicewood Springs Rd
Suite 300
Austin, TX 78759

***Re: Initial Accreditation Denied
ACCET ID #1475***

Dear Ms. de Roch,

This letter is to inform you that at its April 2016 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny initial accreditation to inLingua Language Services, located in Austin, Texas.

The decision was based upon a careful review and evaluation of the record, including the institution's Analytic Self-Evaluation Report (ASER), the on-site visit team report (visit conducted February 18-19, 2016), and the institution's response to that report, dated March 27, 2016. It is noted that a number of weaknesses cited in the team report were not adequately addressed in the institution's response and therefore, 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

The institution did not demonstrate that it utilizes specific criteria to measure whether it is achieving its mission. The team report indicated that the institution claimed to measure success of its mission, in part, through longevity of contracts, renewal of contracts, and returning clients. The institution, however, did not provide adequate data to support the contention that its mission will be measured by these criteria. Additionally, the institution was unable to provide a concise listing of students in order to verify which students were being counted as continuing enrollments and which were considered completers. The number of enrollments for 2014 and 2015 could not be reconciled between the institution's claims and the documents provided for review. It was further noted that the version of the database (FileMaker Pro) being used as the student management system could not generate the reports needed to address this aspect of the standard. Further, no written analysis was provided specifically affirming

market demand in the Austin, Texas area.

The institution stated in its response that during the time of the visit it was in the process of updating its filing software. While the institution provided an updated list of student enrollment numbers for 2014 and 2015 in its response, this documentation was submitted in the form of an Excel spreadsheet which does not provide sufficient evidence of the Filemaker Pro software update that was implemented to generate consistent, up-to-date enrollment data. Additionally, no assessment of projected need and/or successful market experience was provided as required by the standard. Therefore, the institution has not fully demonstrated compliance with this standard.

2. Standard I-C: Planning

The institution did not demonstrate that its planning documents included all elements required by the standard. The team report noted that the institution's planning documents lacked core elements such as: operational strategies, an operational budget, projected time frames, required resources and methods for subsequent evaluation. Further, no documentation was provided to evidence that a formal planning process takes place at the institution.

In its response, the institution submitted revised planning documents for both short and long-term planning, however these lists provided minimal information regarding the operational and educational objectives of the institution as required by the standard. Further, the meeting minutes submitted did not evidence a *formal* planning process inclusive of projected planning updates and revisions. The document submitted as evidence of an Operational Budget was a prepared financial statement for fiscal year 2015 which does not demonstrate required resources for future planning. Therefore, the institution has not demonstrated compliance with this standard.

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 the institution did not provide the team with a policies and procedures manual relevant to the day-to-day processes of inLingua Language Services at the Austin main campus.

In its response, the institution submitted an updated inLingua Language Services Employee Handbook for Austin. However, other manuals submitted were found to be insufficient and/or irrelevant to their titles: The Language Training Manual submitted consisted of a list of lesson prices; the Translation Manual submitted was an image of a W-9 Form – Request for Taxpayer Identification Number and Certification; and the Operations Manuals submitted consisted of pictures of the front binder covers only. Therefore, the institution had not demonstrated that written policies and procedures are utilized to guide to guide the day-to-day processes of the institution as required by the standard.

4. Standard II-C: Personnel Management

The institution did not demonstrate that management provides orientation, supervision, evaluation and training as well as development of its employees to ensure qualified and capable personnel. The team report indicated that the institution did not have an Employee Handbook outlining workplace policies and procedures. Additionally, there was no documented evidence of professional in-service training for faculty and staff since 2013. The institution's personnel files were found to be incomplete per ACCET Document 21 – ACCET On-Site Visit Personnel File Qualifications Checklist: employee contracts were missing from files; some were missing copies of diplomas/degrees and/or teaching certifications; others were missing evidence of professional development, signed drug policy forms, performance evaluations, resumes, and Employee Handbook Acknowledgment forms.

In its response, the institution submitted an updated Employee Handbook for inLingua Austin; however, evidence of dissemination of this information to staff was insufficiently evidenced by a signed acknowledgement form from one employee. The institution stated that it had updated its personnel files to include the missing documentation with respect to individual teachers' files; however, the exhibits submitted as evidence of this update included only the documents for one faculty member, A. Hill. Per ACCET policy, personnel must be evaluated at least annually. However, inLingua's policy is that performance evaluations for all employees are completed by the Executive Director biennially. Of the current employees at inLingua Austin, only one teacher had worked at the institution long enough to merit a performance evaluation which was dated as follows: "7/24/2015, 2-Year." The institution indicated that instructors would complete additional training on the inLingua Intranet (inLingua Academy) and that it had hosted an IELTS Training Staff Workshop for professional development, however aside from the institution's narrative referring to these events, no documents detailing the actual event or proof of staff participation were submitted. Therefore, the institution has not demonstrated compliance with this standard.

5. Standard II-D: Records

The institution did not demonstrate that it has an organized record keeping system that ensures all records are maintained in an accurate, orderly and up-to-date manner. The team report indicated that the institution's student files were inconsistently maintained. Of the 50 student files reviewed, roughly 60% of them did not contain the necessary documentation including enrollment agreements, financial ledgers (most had paid receipts only), program start dates and progress sheets. Due to the nature of independent scheduling by students, there is no end date presented. Further, the institution was unable to provide a copy of inLingua's license agreement with inLingua International for review.

The institution stated in its response that during the on-site visit it was in the process of moving to an updated version of its accounting software. As a result, many of the student files were half electronic and half in paper form making the file review more challenging. The institution indicated that the software update had been completed and student files were consolidated; however, the supporting documentation provided included only an Excel spreadsheet listing student start and "close" dates for the past three years. No evidence was provided to demonstrate systematic and effective implementation of the updated software to include all required student records and to demonstrate that the newly implemented record keeping system is ongoing and

effective in tracking student details as required by this standard. Additionally, the institution failed to provide the license agreement from inLingua International. Therefore, the institution has not demonstrated compliance with this standard.

6. Standard III-B: Financial Procedures

The institution did not demonstrate that cancellation and refund policies are consistently administered and comply with accreditation requirements. The team report indicated that the institution's refund policy was not compliant with ACCET Document 31.ESL – Cancellation and Refund Policy. inLingua does not provide a refund after the end of the second day of class in all programs offered. The student's only option is to reschedule. The institution does not specify a timeframe or time limit for rescheduling a class to help guide students in this process. Further, the institution failed to disclose what costs (if any) are considered non-refundable.

In its response, the institution stated that its Cancellation and Refund policy had been in place since 2005 and that it now conformed to ACCET Document 31.ESL. However, the refund policy/scheduling form provided indicates that units “*must be either taken or refunded within one year,*” but provides no additional explanation of refund calculations, formulas or criteria. Further, the enrollment agreement states that refunds are only available in limited circumstances, which does not comply with ACCET policy. Additionally, clear disclosure of any non-refundable fees was not evidenced. The institution also provided a blank copy of a Cancellation Form, however, it appears to be for class cancellations and does not address cancellation of a program/enrollment period. Therefore, the institution did not demonstrate compliance with this standard.

7. Standard IV-D: Curriculum Review/Revision

The institution did not demonstrate that it had systematic and effective procedures to continuously monitor and improve the curriculum. The team report indicated that the institution was unable to provide verification that staff at the Austin main campus participated in inLingua International curriculum workshops or that the staff had been briefed on any curriculum changes instituted by the corporate office in Bern. The institution failed to provide evidence that it solicits and utilizes feedback from relevant parties (i.e. faculty, students, graduates, sponsors, etc.) to inform and analyze curriculum design and learning outcomes.

In its response, the institution emphasized that its curriculum is created, monitored and updated by the inLingua International corporate office in Bern. The corporate office communicates major changes and advances in curricula and materials at two large, annual meetings: the International inLingua Congress and the inLingua Americas meeting. Additionally, the institution stated that changes in curricula are communicated through monthly newsletters which are archived online on the inLingua intranet. Further, the institution cited its ISO certification (ISO 29990) as evidence of curricular development, improvement, and maintenance claiming it is carried out in accordance with the ISO 29990 standards. However, the meeting minutes provided as documentation of curriculum review are minutes from business meetings that do not demonstrate curriculum feedback, solicitation from constituencies, or review of curriculum

changes made by the corporate office. Therefore, the institution did not demonstrate compliance with this standard.

8. Standard VI-B: Supervision of Instruction

The institution did not demonstrate that regular classroom observations, along with supervisory feedback, are documented and effectively utilized to enhance the quality of instruction. The team report indicated that the institution recently initiated a policy of observing instructors once per year, however there was no documented evidence of implementation. As a result, it could not be determined if improvements had been made relative to teaching methodology or programs as a result of observations and subsequent evaluations.

In its response, the institution explained that the policy of evaluating instructors had not been implemented in the past due to the low number of instructors. Additionally, the institution provided detailed plans with supporting theory and practice documentation relative to how the policy and procedures are conceptualized and how they will be implemented going forward. However, the documentation provided consisted of a blank Trainer Evaluation Feedback Form, a blank Record of Trainer Evaluation and Feedback Form and one teacher evaluation completed by a student. The institution failed to provide evidence of completed supervisory evaluations and classroom observations as required by the standard. Therefore, the institution did not demonstrate that supervisory feedback is documented and effectively utilized to enhance the quality of instruction as required.

9. Standard VI-C: Instructor Orientation and Training

The institution did not demonstrate implementation of an effective written policy for the ongoing professional development of institutional personnel. The team report indicated that the institution had no documentation to verify professional development or ongoing training for faculty aside from the established new instructor orientation.

In its response, the institution outlined plans for professional development by way of the inLingua Academy Novice Trainer module (online). Additionally, the institution cited the monthly newsletters sent from the corporate office as an additional source for ongoing professional development as well as utilizing the results of yearly evaluations; however, the Commission points out that these evaluations have yet to be implemented. The institution failed to provide documentation of completed professional development for any faculty member. Therefore, the institution did not demonstrate compliance with this standard.

10. Standard VII-B: Enrollment

The institution did not demonstrate that its enrollment agreement or contract indicates full disclosure of rights, obligations and responsibilities of all parties including costs and cancellation and refund policies. The team report indicated that the institution's current enrollment agreement

(registration form) included the institution's refund policy which is not fully compliant with ACCET Document 31.ESL – Cancellation and Refund Policy and that the enrollment agreement did not stipulate program name, cost of the program, start date, end date or any non-refundable charges.

In its response, the institution stated that the Student Handbook contains “*a full listing of refund policies,*” but failed to address the issues related to the requirement of the registration form/contract. No revised forms were provided to demonstrate full disclosure of student rights, obligations, responsibilities, costs, and cancellation and refund policies. Therefore, the institution did not demonstrate compliance with this standard.

11. Standard VIII-D: Employer / Sponsor Satisfaction

The institution did not demonstrate that written policies and procedures are followed that provide an effective means by which to regularly assess, document and validate sponsor satisfaction related to the quality of the education and training services provided. The team report indicated that the institution had no written policies and procedures used to solicit and analyze feedback from sponsors. The institution was therefore unable to provide samples of sponsor surveys.

The institution stated in its response that sponsor satisfaction was gauged by student satisfaction: “*...the corporate sponsor is satisfied with our performance when the student is pleased with our instruction and his/her experience in the course.*” The institution further explained that their corporate clients offer inLingua services to their employees (or employees' spouses) as a “perk” to facilitate integration into the Austin community. However, solicitation of sponsor satisfaction is required by the standard. Further, the institution stated that it planned to implement a customer satisfaction survey going forward to better understand its market but no documentation was provided to demonstrate implementation of a sponsor satisfaction survey. Therefore, the institution did not demonstrate compliance with 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 education and training services provided relative to completion data. The team report indicated that the institution did not provide a policy regarding the tracking, documenting and validating of completion rates. Further, no supporting data with regard to completers was provided.

In its response, the institution explained the unique nature of their student market which is primarily composed of working adults who take private tutorials adjusted to their individualized needs and preferred schedules. However, the Commission points out that tracking of student outcomes by way of completion rates is a requirement of the standard. The institution failed to provide a policy and procedure defining a completer and outlining the

process for tracking these outcomes. As a result, no completion rates were provided. Therefore, the institution did not 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

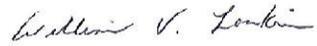
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ACCET office at your earliest opportunity.

Sincerely,

A handwritten signature in cursive script that reads "William V. Larkin".

William V. Larkin, Ed.D.
Executive Director

WVL/cc

CC: Mr. Herman Bounds, Chief, Accreditation Division, US ED,
(aslrecordsmanager@ed.gov)