



September 2, 2022

VIA EMAIL
jbenoit@lsi.edu

Mr. James Benoit
Director
Language Studies International
1706 Fifth Avenue, 3rd Floor, Suite 301
San Diego, CA 92101

***Re: Reaccreditation Deferred
Institutional Show Cause Vacated
Interim Report Reviewed
Interim Report Required
ACCET ID #889***

Dear Mr. Benoit:

At its August 2022 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) considered the application for reaccreditation of Language Studies International, the team reports (on-site visit conducted May 26–27, 2022 to the main campus in San Diego, CA, and virtual branch campus visits conducted June 16–17, 2022 to New York, NY; June 21–22, 2022 to Berkeley, CA; and June 23–24, 2022 to Boston, MA), and the institution's response to those reports dated July 4, July 20, July 26, and July 28, 2022, respectively.

Additionally, the Commission considered the interim report submitted by Language Studies International (LSI) on June 29, 2022 in response to the April 2022 Show Cause directive continued from the December 2021 meeting based on the institution's failure to submit 2020 financial statements. The institution was directed to provide (1) a narrative update to include a compelling rationale to show cause why LSI's accreditation should not be withdrawn; (2) a narrative description providing specific details of the variable interest entities represented in the school's financials; (3) a detailed operational strategy to increase revenue and control costs; (4) an analysis by month comparing budget versus actuals year-to-date (January–June 2022) with a projection for the subsequent two quarters (July–September 2022 and October–December 2022); and (5) a proposed Teach-Out plan in accordance with ACCET Document 32 – Teach-out/Closure Policy.

In its interim report submitted June 20, 2022, the institution provided a financial review, compiled financial statements for 2020 and 2022, a current balance sheet, and a statement of earnings. These documents demonstrated financial recovery and the availability of sufficient resources to meet the institution's obligations. Therefore, the Commission determined that a Teach-Out Plan is no longer necessary and voted to vacate the Institutional Show Cause directive.

As a result of its review of the reaccreditation team reports and responses, the Commission voted to defer consideration and continue the institution's accredited status pending further review at its December 2022 meeting. While the institution's team report responses partially addressed some of the weaknesses raised in the team reports, the following areas need further clarification or resolution relative to ACCET standards, policies, and procedures.

Toward that end, the Commission directed the institution to submit an interim report to include the following specific items:

1. Standard I.C – Planning (New York, NY branch campus)

The team report indicated that LSI's plans do not address the projected increase of students at the New York branch location. If projections are accurate, the institution is unlikely to be able to serve the student population successfully without clear plans for the recruitment and training of new instructors.

In its response, the institution indicated that instructors are continuously recruited, and there is a job listing posted on Indeed.com. The institution also provided a Zoom invite for a potential teaching candidate, a new teacher orientation checklist, and a faculty policy and procedure manual. However, this response did not specifically address if recruitment efforts have been successful in ensuring that there is a sufficient number of faculty members to manage enrollment growth plans over the next six months.

Therefore, the institution is directed to submit a narrative update on the status of faculty recruitment efforts and evidence of a sufficient number of faculty to manage enrollment growth plans over the next six months.

2. Standard I.C – Planning (Boston, MA branch campus)

The team report indicated that the institution did not provide updates on any short-term plans for the third and fourth quarters, nor were any long-term plans identified in the institution's Corporate Business Operating Plan (2022–2024).

In its response, LSI provided general plans and initiatives for the organization but no specific plans for the Boston branch location nor any documented evidence of meetings or involvement with the local Boston campus staff and management.

Therefore, the institution is directed to submit a narrative update on LSI's planning policies and procedures and a sound, written one-year and longer-range (three to five year) plan that encompasses both the educational and operational objectives of the Boston campus. The plans must include specific and measurable objectives, along with corresponding operational strategies, projected time frames, required resources, and methods for subsequent evaluation, as required by the Standard. Further, the plans must include evidence of involvement of the Boston campus staff

and their familiarity with the plans, including evidence of periodic review of plan achievements.

3. Standard II.A – Governance (San Diego, CA main campus and New York, NY branch campus)

The team report noted that the institution currently lists programs that have not been active since 2019 in promotional materials.

In its response, LSI indicated that they will "delist" inactive programs as needed from ACCET and the BPPE, but further research is needed to delist programs with SEVP; however, the institution did not formally notify ACCET to indicate, in writing, if an approved program or course is not currently being offered and has not been offered (or will not be offered) for at least 24 consecutive months as required by ACCET Document 25 – Policy for New, Revised and Existing Programs/Courses.

Therefore, the institution is directed to provide a narrative update describing which programs remain active and which programs are discontinued. The institution must also provide evidence that ACCET has been formally notified of inactive programs as required by ACCET Document 25 – Policy for New, Revised, and Existing Programs/Courses.

4. Standard II.B – Institutional Management (Boston, MA branch campus)

The team report indicated that the management structure at the Boston branch campus does not include a School Director, which was reflected in the team's interview with the Academic Director, Administration/Student Services Manager, and the General Manager/North America Director, as each of them was unable to identify the financial management process and budget of the campus, nor was evidence of consistent communication between the corporate office and the branch campus provided to the team.

In its response, LSI indicated that it will maintain current staffing levels and that monthly meetings will occur to maintain open lines of communication. However, the response does not substantively address the ongoing issue of the lack of direct operational oversight at the campus. The meeting minutes provided from July 25, 2022 did not address the concerns of the team related to the financial management of the campus or demonstrate consistency in communication between the corporate and campus staff.

Therefore, the institution is directed to provide a narrative response to clarify how the local management of the Boston location is effectively supported by the corporate office, including financial management. Further, the institution is directed to provide documentation to evidence that employee responsibilities are clearly defined and understood, and effectively implemented.

5. Standard II.C – Human Resource Management and Standard VI.C – Instructor Orientation (New York, NY branch campus)

The team report indicated that only the School Director had received formal professional development/in-service training since the reopening of the school in 2021; none of the other staff or faculty have received professional development. Further, the team report noted all orientation documents for current faculty and staff were signed in May 2022, regardless of their individual length of employment. Additionally, during interviews, instructors indicated that their orientation procedure was not sufficient for the execution of their job duties. Most instructor observation documents were unsigned. Finally, the institution did not provide proof of any degree for instructors [REDACTED], as required by ACCET Field Specific Criteria, and the team did not have access to the employee file of [REDACTED].

In its response, the institution cited COVID restrictions for the lack of professional development and indicated that the signature dates were a result of an oversight. [REDACTED] diploma was added to [REDACTED] file, and [REDACTED] file, which had been mislabeled, was found. Further, LSI indicated that [REDACTED] is no longer employed with the institution. Additionally, LSI indicated that faculty orientation procedures have been enhanced. However, the institution did not provide documentation to demonstrate that regular and relevant in-service training and/or professional development is conducted and documented.

Therefore, the institution is directed to submit a written professional development policy and identify the specific professional development activities provided to each faculty and staff member including a list of future planned professional development activities in the next 12 months for faculty and staff. Further, LSI is directed to revise its orientation process and demonstrate revised orientation materials provided to all instructors.

6. Standard II.D – Records (San Diego, CA main campus)

The team report indicated that the record-keeping system does not facilitate ready access and review of records by a third party. Financial, academic, and progress records are split between multiple unlinked systems and physical paper files.

In its response, the institution stated that it is continuing to integrate various systems for effective records retention and management; however, specific timelines for full implementation were not provided.

Therefore, the institution is directed to provide a narrative response to include a records management integration plan with specific timelines and goals to ensure all records are maintained accurately, orderly, and up-to-date and evidence of ongoing integration implementation.

7. Standard III.B – Financial Procedures (New York, NY branch campus)

The team report found that [REDACTED] refund was processed 65 days after the LDA, which does not comply with ACCET Document 31.ESOL, which requires all refunds to be made within 45 days. The team also identified inconsistencies with LSI's cancellation and refund policy.

In its response, the team indicated that refund policies had been corrected and procedures had been adjusted to avoid further late refunds. The institution also provided updated refund policy and procedure documents. However, the institution did not provide examples of implementation of the new policies and procedures.

Therefore, the institution is directed to provide a sample of five student withdrawal files for the New York, NY branch campus, resulting in refunds being processed consistent with the institution's newly revised policies and procedures. The files must include calculation worksheets, student ledgers, attendance records, and evidence of refunds, if applicable.

8. Standard III.B – Financial Procedures (Boston, MA branch campus)

The team report indicated that staff were unable to describe the budgeting process during interviews, and the institution could not provide a current budget for the team to review. Further, the team identified a late refund and discrepancies in record keeping based on system limitations and noted that the refund policy does not comply with all elements of ACCET Document 31.ESOL.

In its response, the institution provided a narrative description of improvements made through financial restructuring processes and a corrected refund policy. However, the institution did not demonstrate that these restructuring efforts have led to process improvements and the issuance of timely refunds.

Therefore, the institution is directed to provide a narrative response to include an update on the integration of the records management systems and a sample of five student withdrawal files for the Boston, MA branch campus. The withdrawn student files must include refund calculation worksheets, student ledgers, attendance records, and evidence of refunds, if applicable.

Further, the institution is directed to provide evidence of training at the campus level to ensure local management has had budgetary training and has knowledge of the management of budgetary expenditures.

9. Standard IV.D – Curriculum Review/Revision (Boston, MA branch campus)

The team report indicated that the institution did not demonstrate that it follows its published curriculum review policy. The team report also indicated that there is no one at the corporate level who is responsible for formal curriculum review.

In its response the institution indicated that they will appoint a Regional Academic Director to oversee quality, integrity, consistency, and best practices at the corporate level. The position will be responsible to ensure the curriculum for all major programs is reviewed on an annual basis in coordination with academic directors and by gathering feedback from teachers and students. The institution's goal is to fill the position by the end of the third quarter or sooner.

Therefore, the institution is directed to provide a narrative update to include actions taken to fill the Regional Academic Director position, as well as a job description for this role. Concurrently, the institution is directed to demonstrate that the curriculum has been reviewed in accordance with the institution's curriculum review policy.

10. Standard VI.A – Qualifications of Instructional Personnel (Boston, MA branch campus)

The team report noted that transcripts or diplomas were provided for all instructors except for [REDACTED].

In its response, the institution indicated that the Academic Director believed that [REDACTED] is qualified based on a CELTA certification, positive student feedback, experience, and evaluations. However, it remains unclear whether [REDACTED] earned a bachelor's degree, as required by ACCET's Field Specific Criteria.

Therefore, the institution is directed to either provide a copy of [REDACTED] bachelor's degree or a detailed narrative justification to clarify further [REDACTED] experience, background, certificates, transcripts, evaluations, and student feedback.

11. Standard VI.B – Supervision of Instruction (New York, NY branch campus)

The team report indicated that through a review of student academic files, the team found that instructors have not consistently entered test grades. In interviews, the team noted that the School Director was unsure if tests had been consistently administered.

In its response, the institution indicated that an additional column had been added to the attendance sheet for test scores and cumulative weekly academic scores so that teachers could input the information on these forms and E-LSI. Rosters are scanned and verified weekly, and the School Director checks the E-LSI system to ensure that grades have been uploaded. The institution provided evidence of implementation; however, it is unclear how faculty and staff have been trained on these new procedures.

Therefore, the institution must submit a narrative response and documentation to demonstrate that the faculty have been trained and understand the new grading procedures.

12. Standard VIII.A – Performance Measurements (New York, NY branch campus)

The team report indicated that LSI's placement test includes grammar and vocabulary only; there is no reading/listening. Writing appears to be optional, and there is no formal speaking test. There is no formal mid-term exam or evaluation, and policies related to progress reports and exit exams are unclear. Further, the team report indicated that there were no student-level advancement assessments to demonstrate the alignment of the institution's curriculum within the recognized framework. Finally, the institution did not provide documented evidence that the institution analyzes the data obtained from measuring its programs against recognized benchmarks and utilizes the data to improve the institution or its programs, as required by the ACCET field-specific criteria.

In its response, the institution provided a narrative update and meeting minutes demonstrating that instructors have been retrained on the institution's performance measurement requirements. Further, office hours have been extended, and adjustments to "Student Profiles" on the E-LSI platform have been made to track student performance more easily. While the exhibits provided included documentation of implementation of new performance measurement standards, they were insufficient to demonstrate regular and systematic implementation over time. Further, the institution did not address the team's concerns regarding placement testing.

Therefore, the school is directed to submit three current student files to include progress reports and level tests, to demonstrate systematic and effective implementation and ongoing compliance with the Standard. Further, the institution is directed to provide a narrative update on its placement test to demonstrate how it adequately measures student proficiency relative to its program levels and content (i.e., listening/speaking, grammar, writing).

13. Standard VIII.A – Performance Measurements (Boston, MA branch campus)

The team report indicated that the institution did not demonstrate documented evidence that it analyzes the data obtained from measuring its programs against recognized benchmarks and utilizes the data to improve the institution and/or its programs.

In its response, the institution indicated that planning is occurring to incorporate an analysis of data gathered from measuring LSI's programs against established benchmarks into an annual curriculum review; however, documentation of implementation was not provided.

Therefore, the institution is directed to submit a narrative response on its plans to analyze the data obtained from measuring its programs against a recognized benchmark and utilize the data to improve the institution and its programs. Additionally, the institution is directed to provide documentation, such as meeting minutes and preliminary analysis, to document the successful implementation of the plan.

14. Standard VIII.B – Attendance (Berkeley, CA branch campus and Boston, MA branch campus)

The team report indicated that the institution’s Leave of Absence policy does not contain all elements required by ACCET Document 36.ESOL – Leave of Absence, Medical Leave, and Vacation Policy.

In its response, the institution provided an updated Leave of Absence policy document but did not provide an example of implementation.

Therefore, the institution is directed to provide a sample student file from the Boston, MA, and Berkeley, CA campuses to demonstrate the successful implementation of the revised Leave of Absence policy. If a sample student file is unavailable, a narrative description of the process is required.

15. Standard VIII.C – Student Progress (New York, NY branch campus)

The team reported indicated that the institution’s SAP policy includes consequences of failure to meet satisfactory progress standards and a description of how students are notified of progress concerns; however, the school did not demonstrate implementation of the policy as there were not enough test scores to determine if a student was meeting SAP, and there were no warnings in student files.

In its response, the institution provided additional teacher training, information on an “early warning” system, additional interview processes for students desiring to “level up,” and an updated study policy guide. The institution also indicated that a process of rolling out midterm tests is underway; however, evidence of implementation of midterm tests was not provided.

Therefore, the institution is directed to submit a narrative response on the status of the midterm tests, three examples of completed midterm tests, and three examples of the detailed progress report, which is provided to students every six weeks, reflecting implementation of the midterm tests.

16. Standard VIII.C – Student Progress (Boston, MA branch campus)

The team report indicated that LSI’s Student Policy Guide states, “Level Repetition: A 12-week level may be repeated once if it is determined to be of benefit to the student.

After completing two 12-week sessions at the same level a student will meet with the Academic Director to complete a Level Continuance Request if more time at the same level is needed.” Students who are placed into the C1 advanced level may repeat the class indefinitely, which is not allowable by ACCET policy. There are no additional classes after the C1 level, so if a student signs up at LSI for more than 12 weeks and passes C1, they could potentially repeat the level without a valid academic reason, and this could continue throughout the student’s time at LSI.

In its response, the institution updated its Student Policy Guide to include a new policy as follows: “Students can take a Progress Test every six weeks. These scores will not factor into the cumulative academic average. Performance on this test will indicate whether a student should remain at the current level or should be promoted to the next level. To advance to the next level, students must pass the Progress Test and maintain at least a 70% average on weekly review test scores. On average, it takes students 10-12 weeks to complete a level, but the duration can vary depending on an individual's learning needs and performance.” However, the revised policy does not address the maximum time a student can stay at a level or what happens if a student is not making progress.

Therefore, the institution is directed to provide a revised SAP policy to clarify the maximum times a student can repeat a level, the consequences if a student fails to make progress and provide examples of policy implementation. Further, the institution is directed to provide a narrative update on student repeats in level C1 and provide transcripts of three students enrolled in that level.

17. Standard IX.A – Student Satisfaction (New York, NY branch campus)

The team report indicated that LSI is currently evaluating student satisfaction only at the end of a student’s program. Standard IX.A – Student Satisfaction requires interim and final evaluations upon completion of the term of enrollment.

In its response, the institution indicated that weekly emails are sent to all departing students with a link to a student satisfaction survey. The institution also indicated that they will be sending a link to all students every six weeks at the time of the midterm test as a means to track student satisfaction midway through courses. The institution also provided exit survey results from May 18–July 15, 2022; however, survey questions are specific to students who are exiting the program and are not appropriate for a midterm evaluation.

Therefore, the institution is directed to provide clarification on its interim evaluation of student satisfaction to include revised survey questions as appropriate. Additionally, the institution must provide documentation of implementation of a midterm survey, and analytics and meeting minutes to demonstrate that the survey results have been reviewed and discussed.

The institution's response, including the attached **Interim Report cover sheet**, must be uploaded (link provided below) no later than **October 31, 2022**, for the institution's report to be considered further at the Commission's December 2022 meeting. Please see the attached submission instructions.

ACCET Dropbox upload link: <https://www.dropbox.com/request/owwNFFSirPC8ai6OKh25>

As a reminder, a \$500 late fee will be charged to an institution for the late submission of an Interim Report. Please see (page 6 of) ACCET Document 10 – Fee Schedule for additional information.

Deferral of reaccreditation is not an adverse action and is explained in ACCET Document 11 – Policies and Practices of the Accrediting Commission, which is available on our website at www.accet.org. The deferral of a final decision is intended to allow for an opportunity to clarify and/or resolve the issues of concern cited herein, specifically focused on the demonstration of systematic and effective implementation of revised policies and procedures in practice over time. In accordance with Commission policy, no substantive changes, including, but not limited to, new programs or major program revisions, new branch campuses or other new sites, and/or relocation out of the general market area, will be permitted during the term of the deferral period.

Should you have any questions or need further assistance, please contact the ACCET office at info@acct.org or (202) 955-1113.

Sincerely,



Res Helfer
Executive Director

RH/bh

Attachments: Interim Report Cover Sheet
Interim Report Submission Instructions