



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING  
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VIA FEDERAL EXPRESS & EMAIL  
(bbyu565@sbcglobal.net)

Mr. Brian Yu, President  
Ivy E & E Institute  
d/b/a Ivy College  
482 N. Milwaukee Ave  
Wheeling IL 60090

***Re: Initial Accreditation Denied  
(Appealable, Not a Final Action)  
ACCET ID #1342***

Dear Mr. Yu:

This letter is to inform you that, at its April 2013 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny initial accreditation to Ivy College, located in Wheeling, Illinois.

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 January 23-24, 2013), and the institution's response to that report, dated February 26, 2013. The Commission noted that none of the 23 weaknesses cited in the team report were adequately addressed in the institution's response, and determined that the institution has not demonstrated compliance with respect to ACCET standards, policies, and procedures, relative to the following findings:

1. Standard I-A: Mission

The institution did not demonstrate that its mission aligns with the educational programs offered, or that the institution is able to measure and analyze the success of its mission.

The team report indicated that the institution's mission and website include reference to career programs and college preparatory programs, which the institution does not offer, nor were they included in the institution's application for accreditation. Further, the institution indicated that it measures the success of its mission through analysis of program completion rates; however, the institution lacks an effective system for tracking those who have completed. The institution's response indicated that it has revised its mission statement to include only English as a Second Language programs and claimed that the revised mission "*will be posted on the school website and prominent places on school campus,*" but failed to provide any evidence that the revised mission statement has been publicized, as required by the standard. The

institution indicated that it will begin using a purchased database, Orbund Online Education Management System, to track completion rates; however, at the time of the response submission, the institution had yet to install the software tracking program and therefore did not evidence its application to track completion rates. Accordingly, the institution failed to demonstrate systematic and effective implementation of the revised mission statement and its process to measure success of that mission statement.

2. Standard I-C: Planning

The institution did not demonstrate that its short and long-term plans encompass both the education and business objectives of the institution, and that those plans include specific and measurable objectives, with corresponding operational strategies, projected timeframes, required resources and methods for subsequent evaluation.

The team report indicated that the institution's plans do not focus on the current needs of the organization. For example, the long-term plan focuses on procuring a larger facility to accommodate more enrollments; however, the plan did not include strategies or objectives to increase recruitment efforts or to sustain increased enrollment. The short-term plan only includes obtaining accreditation and lacks any mention of educational objectives. The institution's narrative response mentions the implementation of the Orbund database system, as well as a need to improve its website plans to attend the ITBE annual conference, and to increase technology in the classroom; however, no formal planning documents were provided that included measurable objectives with corresponding operational strategies. Therefore, the institution failed to demonstrate systematic and effective implementation of sound, written short and long-term planning documents that include specific and measurable objectives, with corresponding operational strategies, projected timeframes, required resources and methods for subsequent evaluation.

3. Standard II-A: Governance

The institution did not demonstrate compliance with statutory, regulatory, and accreditation requirements.

The team report indicated that at the time of the visit, only F-1 students were enrolled at the institution; however, class time was scheduled so that the majority of students were attending in the evening or over the weekend. Multiple students indicated that they work during the day, which is a violation of F-1 student visa status. ACCET Document 50-I –On-Site Immigration Compliance Checklist/Guidelines could not be completed by the team as the institution could not provide progress reports for its students. The institution's response indicated that evening classes are scheduled to accommodate instructors who work during the day. The institution further provided evidence that one student, L. Kwon, enrolled at Ivy College is not on an F-1 visa. The institution provided a copy of his visa and noted that he is working and attends Ivy College in the evening. However, the inclusion of one visa does not negate the team's concern relative to what appeared to be F-1 student employment, which would be illegal. Additionally,

the institution asserted that, “If the school officials have any solid proof or constructive knowledge of F-1 students who are working the school officials will terminate the student’s status and report it to SEVIS.” However, the institution failed to provide published policies and procedures relative to this process, nor did they provide any evidence that this has ever been done at the institution. The institution further claimed that progress reports were available for all students at the time of the visit; however, the response is contradictory, noting that “the school’s personnel provided hard copies of the student’s progress reports, which were not readily available due to our reliance on paper files...” Further, the institution failed to provide any progress report to evidence their prior or current existence. The institution further indicates that with the future implementation of the Orbund software system the institution, “will have easily updated and easily accessible files for review.” As the Orbund system has yet to be implemented, the institution could provide no documentation to evidence this claim. Therefore, the institution failed to demonstrate compliance with statutory, regulatory and accreditation requirements.

4. Standard II-B: Operational Management

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

The team report indicated that the institution lacked written policies and procedures for many operational processes. The institution’s response indicated that it has written policies and procedures for “non-discrimination, copyright protection, progression of levels, student satisfaction, and complaints.” While the Commission notes that these policies and procedures are necessary, they do not evidence a complete set of policies and procedures to be used by management to govern the day-to-day operations of the institution. Further, the institution did not provide any documentation to evidence that those new and revised policies have been distributed to staff and students. Therefore, the institution failed to demonstrate that it has systematically and effectively implemented a comprehensive set of policies and procedures which must be evidenced in practice over time.

5. Standard II-C: Personnel Management

The institution did not demonstrate that management develops, implements, and maintains overall policies and procedures for the systematic and effective recruitment, selection, hiring and retention of all personnel.

The team report indicated a 62% turn-over rate for instructors at Ivy College for the period September 2011 – September 2012, wherein eight of thirteen instructors left over the course of one year. Further, the job descriptions for each position do not include minimum qualifications. The institution’s response indicated that changes have been made to address instructor retention, including additional supervision and support by the Academic Director, conferences being held with each instructor every session to address any questions or concerns, and monthly faculty meetings being held to review policy and procedure changes. However, the institution failed to

provide updated policies and procedure to evidence these revisions, or to provide evidence of instructor conferences, monthly faculty meeting agendas or minutes, or revised job descriptions to include minimum qualifications. Therefore, the institution failed to demonstrate that it has systematically and effectively implemented personnel policies and procedures with must be evidenced in practice over time.

6. Standard II-D: Records

The institution did not demonstrate that is has an organized record-keeping system that ensures all records are maintained in an accurate, orderly, and up-to-date manner. Nor did it demonstrate that its record keeping system facilitates ready access and review of those records by appropriate parties.

The team report indicated that records were not well organized. While there are individual files for each student, the only information contained in those files are financial documents, enrollment agreements (not always dated), and I-20 information. An academic file is not maintained for each student, only per session. Grades are kept only per session, not per student, with no documentation as to how the instructor arrived at the final grade. The institution's only written policy and procedure relative to recordkeeping is the FERPA policy. The institution's response indicated that the implementation of the new Orbund software system will provide orderly, up-to-date files with ready access for third party review. The institution included a copy of its revised record keeping policy; however, the policy indicates what the institution will do when the new Orbund software system is implemented. At the time of the response, that system was not yet in use. The institution asserted that all student academic and attendance data has been stored in an excel spreadsheet that the team did not review; however, the institution failed to provide a copy of this spreadsheet with its response to evidence its prior or current use. Therefore, the institution failed to demonstrate systematic and effective record keeping policies and procedures which must be evidenced in practice over time.

7. Standard III-B: Financial Procedures

The institution did not demonstrate that tuition charges are applied fairly and consistently; receipt of tuition payments and other monies is properly recorded and tracked; or that the cancellation and refund policies are fair and equitable; consistently administered; and comply with statutory, regulatory and accreditation requirements.

The team report indicated that the institution's cancellation and refund policy combines elements of ACCET Document 31 – Cancellation and Refund Policy and ACCET Document 31.ESL – Cancellation and Refund Policy Applicable to Students Enrolled at Avocational ESL Institutions, making it confusing for students as to which policy applies. The policy also indicates that before a refund is made, students must submit copies of "cleared tuition." The institution does not keep written documentation (ledger or otherwise) of the amount the student owes, the amount the student has paid, or an account of all the non-refundable items paid. The only documentation tracked is from the enrollment agreement, whereby items are circled if

payment has been made; however this is not clear to an outside reviewer or to the student. The refund calculation worksheet used is incomplete, as it does not provide a last date of attendance, reason for refund/drop, when the refund was made, or how the refund was calculated. Further, the institution has a number of questionable fees including charges of a "\$300 for an International F-1 processing/consulting fee or optional tuition deposit." It is unclear whether this was a tuition deposit (that should be refundable) or whether this was a consulting fee for processing an I-20. Additionally, students are charged \$50 for every SEVIS I-20 extension or additional printout. The institution's response included a revised cancellation and refund policy, a revised enrollment agreement form, and a revised refund calculation worksheet; however, the language is not consistent among all documents, the \$300 tuition deposit remains unclear as to who it applies to, and the institution is still charging \$50 for every I-20 extension or additional printout. Further, the institution did not provide completed enrollment forms or refund calculation worksheets to evidence systematic and effective implementation of the new forms. Finally, the institution asserts that it will keep a ledger for individual students using the new Orbund database system, which the institution has yet to implement. Therefore, the institution failed to demonstrate systematic and effective implementation of policies and procedures relative to the tracking and monitoring of tuition payments that is a reasonable fee structure or that it has implemented a cancellation and refund policy, and complies with ACCET Document 31.IEP which must be evidenced in practice over time.

8. Standard IV-A: Educational Goals/Objectives

The institution did not demonstrate that its programs have appropriate education goals and objectives; that curricular content and learning experiences are preplanned and present a sound, systematic and sequential educational methodology.

The team report indicated that the syllabus provided to students does not contain specific language objectives. It is a template filled in by hand by each instructor so the format for objectives varies and is not standardized. All classes (with the exception of the Business English class) are mixed-level courses. The team was told by instructors and the Director of Student Affairs that teachers "expect more" of the higher level students and give them additional assignments for homework and assessments, but there is no documentation of how differentiation is achieved as it is left entirely up to the instructors. The Director informed the team that it is the instructor who determines which students in his/her class are at a given level so there is no instructive documentation as to when or on what basis a student starts in a level and how long it takes the average student to complete a level. Additionally, the program is structured in a way that enables students to stay in one stage (comprised of two levels) for 32 weeks, which could even be up to 64 weeks if the student repeats each level one time, with no upward movement; the team found evidence of some students that were in the same stage for two or more years. Ivy College also offers its IEP and Business English program on the weekends, but the total number of classroom hours does not equal 18, as required for F-1 visa students to maintain full-time status. The number of hours in class is fourteen, with four hours of self-study in the computer lab or extra homework outside of class. Further, the institution is offering a TESOL/TEFL certification course, which it did not include in its application for

accreditation. The institution's response included a written policy for level progression; however, the policy is unsound, indicating that, "at the end of 16 weeks, all students at a level will progress to the next level regardless of their performance or attendance." The intent of this policy is to ensure that students do not exceed the maximum time allowed in a language training program, but does not demonstrate logical progression of the student's language ability, as they are not progressing based on mastering the learning objectives of the level. Additionally, the institution claims that a student may study in the ESL program for 36 months, then transfer to the Business English program; however, ACCET Document 18.IEP – Satisfactory Progress Policy, clearly indicates that a student's maximum cumulative total length of the *language training* is no more than 36 months. Further, the institution indicated that the learning objectives are provided as a separate syllabus to each level; however, the only syllabus provided in the institution's response was the blank syllabus to be filled out by the instructor. The institution asserted that instructors use skills sheet to determine if a student has mastered their current level. While the institution provided these sheets for each level, no documentation was provided to ensure that students are made aware of the skills for which they will be assessed, nor did the institution provide evidence of completed forms to demonstrate systematic and effective implementation. The institution stated that weekend courses, "have a 100% attendance rate by the students that attend. Students must attend the weekend courses on a 100% basis in order to maintain an 80% attendance rate which is compliant with F-1 Visa requirements." The Commission points out that the number of class hours required to constitute a full time program is 18. The institution's current method of 14 class hours and four self-paced lab or homework hours does not fulfill this requirement, nor does it demonstrate sound educational practices. The institution further claims that weekend courses will no longer be offered as of May 20, 2013, yet weekend courses are still noted on the institution's website. Further, regarding the TESOL/TEFL program, the institution claims that they do not offer teaching certification, but do award a certificate of completion for this program; however, the program is still not part of the institution's application for accreditation. Therefore, the institution failed to demonstrate that its instructional program has clearly defined and specific learning objectives organized in sequential levels with delineated language skills as required by this standard.

9. Standard IV-B: Program/Instructional Materials

The institution did not demonstrate that program materials are the appropriate scope, sequence, and depth of each program or course in relation to the stated goals and objectives.

The team report indicated that while the IEP materials generally support the curriculum, they do not align fully with the institution's mission statement. In addition, most editions are outdated, some from 1999, and most others from 2001, 2005, and 2006. Further, the college prep materials do not fulfill the course objectives; they are grammar and vocabulary texts, and there is no evidence that teachers use any additional materials or do any college entrance exam practice in class. One textbook in the Business English program is pre-intermediate level, yet the course is intended for upper advanced students. Further, there is no documentation to evidence that students are made aware of copyright laws. The institution's response indicated that the revised mission statement now aligns with the IEP texts for those courses' goals and

objectives. The institution claims that the outdated texts reviewed by the team were for programs that are not currently offered. The College Prep course and the TESOL/TEFL programs were not part of the ACCET application; however, they still remain advertised on the institution's website. The institution included a "copyright policy;" however, no documentation was provided to evidence actual implementation beyond state it "will be" distributed to faculty or students. Additionally, the institution provided a policy relative to textbook selection and curriculum review, but failed to provide evidence that the policy has been implemented. Therefore, the institution failed to demonstrate systematic and effective implementation of program materials that are appropriate in scope, sequence, and depth of each program in relation to the stated curricular goals and objectives.

10. Standard IV-C: Performance Measures and Standard VIII-A: Student Progress

The institution did not demonstrate a sound, written assessment system that contains a set of defined elements, such as a grading scale, weighting factors, tests, quizzes, reports, projects, attendance, and participation, that are appropriately related to the performance objectives of the program or course. Nor did the institution 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.

The team report indicated that the CELSA test, which is used for initial placement and to measure progress bi-annually, does not include a speaking, listening or writing component to determine a student's English proficiency. The team examined rubrics used for writing and speaking evaluations in all stages of the IEP (which come from teacher's guides that accompany course texts); there is no differentiation among levels, and the rubrics are minimal, meaning students frequently receive scores of 100%. Further, the CELSA is given upon initial placement and twice a year although it is not documented whether students are informed or counseled about these scores. Grades are not always made available to instructors/students in a timely manner, and it is also unclear what, if anything, is done when students' CELSA scores go down or do not improve, or if the student misses the bi-annual CELSA test. Additionally, instructors recommend students to move up when they believe the student is ready; however, students are not always moved up even when the instructor has deemed them ready for the next level. For example, one instructor recommended several students (DongJin Han, ByungChul Lim, Youngsook Moon, and YangMo Kou, to move up from level 3 in Summer of 2012; two of the students were still enrolled in the same level during the team visit, despite the instructor's recommendation nearly five months prior. Additionally, the overall design of the program enables students to stay in one level for up to 64 weeks. The program is divided into three stages with each stage being comprised of two levels; when a student "moves up" from level 1 to level 2, they remain in the same class (or stage) until they move up to level 3. As students are allowed to repeat each level one time, they could end up staying in one stage for 64 weeks if they repeat both levels once. This design does not encourage or promote academic progress through the program. Academic records are poorly maintained, making it cumbersome to navigate an individual student's academic history at the institution. Furthermore, the team spoke with several students who said they had been studying at the institution for four or five years, two of

whom said they started in the intermediate level. The Receptionist of the institution has studied at the institution since June 1, 2010 and has been working with the institution part-time since November 2012. She was on a leave of absence during the visit. She also has a bachelor's degree in English Language and Literature, calling in to question her need for an Intensive English Program. She started as an intermediate level and is now in the advanced level. One student, Han, Seung O., has been at the institution since April 30, 2007. Students are required to earn a "C/D average" in order to progress to the next level; while a C (70-79%) is considered satisfactory in most IEP programs, a D average (60-69%) does not demonstrate proficiency and does not represent an educationally sound criteria. Further, there are no clear repercussions for students who fail to meet the institution's requirements. The team reviewed academic warnings filled out by the instructors; however, they were not all signed by students so it is unclear if students were made aware of their unsatisfactory performance. Students who receive an academic warning or notice are not given a timeframe to make-up their low grade or for not meeting the 80% attendance requirement. Students are given the chance to either attend the next session to make up for the failed session. There is no policy currently which describes what would happen to the student who continues to fail to meet the progress policy during the second, third, or fourth session, other than the student having to make-up the failed sessions. Students are told that they are not allowed to transfer to another institution during that time, which violates SEVP policy. No formal progress reports are given to the students or kept as documentation. The institution's response indicated that it will begin using a different placement test, the CaMLA; however, the response did not indicate when this change would take place, and did not provide copies of complete tests to evidence its implementation. The institution further attests that formal progress reports will be given to each student at the end of the eight week midpoint and will require a student's signature. While the institution provided a progression of levels policy, the institution failed to provide copies of completed progress reports to evidence actual implementation of this policy. Further, the institution's policy indicates, as noted previously, under Standard IV-A, that "at the end of 16 weeks, all students at a level will progress to the next level regardless of their performance or attendance," which does not demonstrate sound educational practices. Additionally, the institution claims that a student may study in the ESL program for 36 months, then transfer to the Business English program; however, ACCET Document 18.IEP – Satisfactory Progress Policy, clearly indicates that a student's maximum cumulative total length of the language training is no more than 36 months. Additionally, the institution indicated that failure to meet academic progress for two consecutive sessions will result in termination; however, no documentation was provided to evidence that this policy has been shared with faculty or students, or evidence that this policy has ever been implemented. Therefore, the institution failed to demonstrate that it systematically and effectively assesses language acquisition periodically and at each level against a proficiency matrix to facilitate students moving from one level to the next in an orderly and preplanned manner which must be evidenced in practice over time.

#### 11. Standard IV-D: Curriculum Review/Revision

The institution did not demonstrate systematic and effective procedures to continuously monitor and improve the curriculum, or that written procedures are provided to evidence soliciting

feedback from relevant constituencies, such as faculty, students, graduates, and advisory/certification boards, as well as analysis of completion results.

The team report indicated that although the Academic Director said that curriculum was last updated in July 2012 and October 2012, the only documentation to evidence this revision were meeting minutes from July 3, 2012, which state that the Academic Director revised the curricula as a result of ACCET's recent site readiness visit, yet no details were provide to demonstrate what was revised, and on the basis of what feedback. The institution's response indicated that faculty have always been included in the curriculum review and revision process and cited the July 3, 2012 meeting minutes as evidence that faculty were included; however, those meeting minutes do not demonstrate what kind of feedback was received, how it was used and what the final revisions entailed. Further, the institution provided no evidence that the curriculum is reviewed regularly, nor that student feedback is included in the revision process. Therefore, the institution failed to demonstrate the systematic and effective implementation of policies and procedures to continuously monitor and improve the curriculum using feedback from relevant constituencies, such as faculty, students, graduates, which must be demonstrated in practice over time.

## 12. Standard V-A: Instructional Methods

The institution did not demonstrate that instructional methods encourage active and motivated responses from participants. The institution did not demonstrate that written policies and procedures are in place to ensure that the curricula are followed and that there is consistency of application by all instructional staff, nor was it able to demonstrate that the instructional methodology is consistent with current training industry standards.

The team report indicated that the institution does not have a written policy and procedure nor do they subscribe to any particular teaching methodology. The methodology is up to the teachers' discretion to employ their own methods, which leads to inconsistencies in classroom instruction, and makes it difficult if not impossible to document and monitor methodologies used in the program. The institution does not impose an English-only rule during classes, resulting in regular use of student's native languages contrary to widely adopted best practices for IEP students. Further, printed materials throughout the institution have been translated into Korean, which does not promote the students' immersed use of English in their Language studies. The institution's response included a newly created written policy relative to the methodology of instructors, focusing on the communicative approach; however, the institution did not provide any documentation to evidence that this new policy has been distributed to faculty, or that any training in the communicative approach, or subsequent supervision/observation of communicative learning theory instruction, has been provided. Further, the institution provided an English only policy that "will be posted throughout the building and in all classrooms;" however, the institution did not provide any evidence that this policy has been shared with students and faculty, or that it has been implemented. Therefore, the institution failed to demonstrate systematic and effective implementation of written policies and

procedures that ensure methodology and curricula are followed, consistent with current training industry standards.

13. Standard V-C: Equipment/Internships

The institution did not demonstrate that adequate, appropriate, and functional equipment, supplies, furnishings, and learning resources required to effectively provide the education and training services are readily available for instructor and participant use.

The team report indicated that there is no written policy and procedure for guidance to ensure that adequate quantities of equipment/supplies are available and in working condition. The institution's response indicated that an equipment and supply policy had been created; however, the exhibit included is simply a form for instructors to complete if repair and/or supplies are need. While this is a step in the right direction, it lacks the required elements of a useful policy, including parties responsible for ordering additional supplies and providing equipment maintenance. Further, the institution did not provide documentation to evidence that this policy has been shared with faculty or that it has been implemented. Therefore, the institution failed to demonstrate systematic and effective implementation of an equipment/materials supply policy which must be demonstrated in practice over time.

14. Standard V-D: Facilities

The institution did not demonstrate that facilities meets all applicable local, state, and federal requirements.

The team report indicated that the institution had recently used an additional location at the Christian Heritage Academy (CHA). At the time of the visit, the location was not being used; however, all advertising materials still promote this location. The ASER stated that "since September 2012, Ivy no longer uses this facility due to a drop of enrollment for this class. Ivy will use the CHA facility again only if there is a need to accommodate an overflow of students." This facility was not listed in the initial application. The institution's response indicated that it has deleted reference to CHA and has revised its advertising materials and that any reference of CHA on the official website of Ivy will be deleted when a new website is constructed, yet CHA is still listed on the website. Further, the institution's revised enrollment agreement, included as an exhibit in the institution's response under Standard III-B. Financial Procedures, includes reference to an additional campus in Northfield, the city in which CHA is located. Therefore, the institution failed to demonstrate that its facilities meet ACCET regulatory requirements.

15. Standard VI-A: Qualifications of Instructional Personnel

The institution did not demonstrate that it's instructional personnel meet all relevant accreditation, federal, state, local, and/or industry-specific requirements.

The team report indicated that while all of the instructors currently employed at the institution meet ACCET's minimum ESL instructor qualifications, the institution's minimum instructor qualifications do not require prior teaching experience, as required by the field specific criteria under this standard. The institution's response included a statement that the policy will change to state that in addition to a bachelor's degree, an Ivy College instructor must also have at least six months of teaching experience in ESL either in the United States or another country; however, the institution did not provide a revised policy, or job description to reflect this change. Therefore, the institution failed to demonstrate systematic and effective implementation of a minimum faculty qualification requirement compliant with ACCET standards.

16. Standard VI-B: Supervision of Instruction

The institution did not demonstrate that supervisors of instructional personnel demonstrate good practice in the evaluation and direction of instructors, or that regular classroom observations are documented and effectively utilized to enhance the quality of instruction.

The team report indicated that the written policy for instructor observations currently states that observations will be done in the first session and then as it is deemed necessary, which does not provide for regular observations of faculty to improve quality of instruction. Further, the only documented observations provided were for the previous session. Also, there is no written policy on substitute teaching. The institution's response included a written policy relative to substitute teachers; however, the institution provided no evidence that this policy has been shared with faculty, or evidence that it has been implemented. Further, the institution provided evidence of one classroom observation completed in 2011, and two additional observations completed in 2012; however, three observations over the course of two years, does not demonstrate systematic and effective implementation of classroom observations. Further, it was noted by the institution under Standard II-C. Personnel Management that the role of the Academic Director was revised to include additional observation and support for instructors, yet the institution provided no documentation to evidence teacher observations or supervisor feedback since the team visit. Therefore, the institution failed to demonstrate systematic and effective implementation of instructional supervision which must be demonstrated in practice over time.

17. Standard VI-C: Instructor Orientation

The institution did not 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 report indicated that while there is a checklist of materials to cover with new instructors, there is no written policy and procedure for instructor orientation. One in-service training session has been offered at the institution, but the institution does not have a policy for on-going in-service training for instructors, and there was no documentation of additional formal or informal training. The institution's response included a newly written policy relative

to the orientation of new faculty and a separate policy relative to professional development. The institution further referenced the January 2013 staff development workshop as evidence of professional development; however, the minutes to the faculty meeting provided in the response did not indicate any professional development activities. Further, the institution failed to provide any additional examples of in-service training completed or scheduled for the future. Additionally, the institution claims that all instructors are required to attend at least one staff development workshop per year, but provided no evidence to document any workshops attended by staff. Therefore, the institution failed to demonstrate systematic and effective implementation of ongoing professional development of instructional personnel which must be demonstrated in practice over time.

#### 18. Standard VII-A: Recruitment

The institution did not 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, location, outcomes, and other benefits, or that all communication with prospective students is ethical and honest.

The team report indicated that the institution's major advertising efforts promotes that the institution offers I-20's or F-1 Visas. In many cases, those statements are more prominent than the programs themselves. In the windows of the institution there are neon-signs with the words 'I-20's' and "F-1 Visa." The President's business cards indicates "SEVIS I-20, F-1 Visa, Admission to U.S. Universities," which calls into question the institution's recruiting methods so focused on a target promotion and so minimally on quality education and training. Additionally, the institution's campus includes signs for, "placement office," referring to the institution's previously offered career programs, but have failed to remove the information that deals with placement and employment, sending both a mixed and erroneous message to students, particularly those on F-1 Visas who are ineligible for employment. Further, the institution does not have a written policy and procedure for advertising and recruitment that states the person responsible for coordinating and monitoring the advertising campaign for the institution, how the institution ensures that informational and promotional materials make only justifiable and probable claims in compliance with ACCET Document 30 – Policies for Recruitment and Advertising/Promotional Practices and any applicable state or federal regulations. The institution's response indicated that the neon F-1 and I-20 signs have been removed and that a recruitment and advertising policy has been implemented. The institution asserted that new advertising has been created with the removal of F-1 promotion; however, the advertising example provided still includes the prominent promotion of I-20s. Further, the example still includes the promotion of the TESOL/TEFL course which the institution did not include in its application and claims to have discontinued. Therefore, the institution failed to demonstrate systematic and effective implementation of accurate and ethical promotional materials, advertising, and representations of the institution's courses, programs, and location.

19. Standard VII-B: Enrollment

The institution failed to demonstrate that it provides in its written enrollment agreement or contract the full disclosure of the rights, obligations, and responsibilities of all parties in clear and explicit language.

The team reported indicated that the enrollment agreement is half in English and half in Korean making it difficult for the team to review the agreement for compliance and accuracy. The team reviewed the institution's Korean webpage (translated into English from Google Translate) and noted that it gives students inappropriate advice relative to the exact verbiage to use when interviewed by the consulate to obtain a student visa, including detailing specific answers to consulate questions. The institution's response indicated that the advice given in Korean is intended to guide prospective students through a process that is unfamiliar to them and that, "both sites will be reviewed to ensure that there is no inappropriate content, and that each reflects only an accurate translation of the other;" however, the institution did not provide any evidence to demonstrate that action, nor has it changed or revised its website. The institution did provide a revised enrollment agreement in English; however, the Commission further noted that the enrollment agreement included as an exhibit in the institution's response to this standard shows the campus option of Northfield to be whited-out, whereas the enrollment agreement included as an exhibit for Standard III-B, Financial Procedures, includes an option to choose either the Wheeling or Northfield campuses. Therefore, the institution failed to demonstrate systematic and effective implementation of a written enrollment agreement or contract including the full disclosure of the rights, obligations, and responsibilities of all parties in clear and explicit language.

20. Standard VIII-B: Attendance

The institution did not demonstrate that the attendance policy is effective in ensuring that student participation and preparation are consistent with the expected performance outcomes of the course work.

The team report indicated that the institution's attendance policy is not consistent with ACCET attendance requirements; specifically, it does not include a method of tracking attendance with readily available documentation that permits 3rd-party inspection and validation on-site, nor does it include definitions for and consequences of tardiness and early departures. There are no clear repercussions for a student if they fail to meet the attendance policy aside from failure of the level in which they are enrolled. Make-up work is allowed and completed unsupervised in a computer lab. The instructors told the team that if a student is 15 minutes late to class or if they leave early for any reason, it is marked on the daily attendance record, and if a student gets marked tardy four times, it is considered an absence; however, the team could find no evidence of this policy in writing, nor was there documentation in the attendance records to evidence the implementation of this policy. Additionally, the team noted the high number of students on vacation or leave of absence. At the time of the visit 34 students were on vacation and eight students were on an LOA. The institution's response indicated that the number of students on

annual vacation or leave of absence at the time of the visit was 27% of the total student population (42 students of 155). The institution further asserts that there is no charge for processing vacation or leave of absence. The institution provided a written attendance policy and a revised vacation form; however, the institution did not provide evidence these have been shared with faculty and students or that they have been implemented. Further, the institution indicated that lab time make-up work is under review and that attendance will be easier to review when the Orbund database system has been implemented, yet provided no evidence of revisions necessary to meet the requirements of ACCET policy. Therefore, the institution was failed to demonstrate systematic and effective implementation of complaint attendance policy which must be demonstrated in practice over time.

21. Standard VIII-C: Participant Satisfaction

The institution did not demonstrate that open lines of communication with participants exist and demonstrate responsiveness to student issues, or that written policies and procedures exist 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 institution did not demonstrate evidence of interim evaluations and a final evaluation upon completion of the term of enrollment.

The team report indicated that the institution does not have written policies and procedures relative to regular assessment of student satisfaction. Students complete Course and Teacher Evaluation forms every session; however, students do not have anonymity, as they complete these forms in class while supervised by the teacher they are evaluating, raising concerns that students may be hesitant to write anything critical as there is a high probability that the student will have the same instructor the following session. The forms themselves are minimal in content and do not provide much in the way of student feedback relative to the quality of education and training, or the student services offered. Additionally, no official exit survey is conducted when students leave the institution permanently. Further, there is no written policy relative to student complaints. The institution's response included a newly written policy for administering student surveys as well as a complaint policy, and revised survey forms; however, the institution did not provide any evidence that these policies have been shared with the faculty and students, or provide evidence that the new forms have been systematically and effectively implemented. Therefore, the institution failed to demonstrate systematic and effective implementation of a written policy regarding student satisfaction which must be evidenced in practice over time.

22. Standard VIII-E: Completion and Placement

The institution did not demonstrate that 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 team report indicated that the institution does not have a written policy for the tracking and analysis of completion rates, nor does it have a clear way to track all students enrolled, dropped, cancelled, withdrawn, or transferred other than the SEVIS record. Additionally, the institution does not include, as part of their completion rate, students who have dropped or who decide to transfer to another school before completing their enrollment contract. Enrollment contracts do not provide a specific time frame for completion, only the session enrolled, but with no expected completion date. The institution's response included a written completion policy, yet is still unclear relative to the completion status of a student who begins in the middle of a term, but does not complete the following session. This new policy relies on the data collected using the Orbund database system which has yet to be implemented. The institution asserts that an Excel spreadsheet was used at the time of the visit to track this data; however, the institution did not include it as an exhibit. Additionally, the institution did not provide any completion rates to demonstrate the systematic and effective implementation of the new policy. Therefore, the institution failed to demonstrate systematic and effective implementation of written policies and procedure to regularly assess, document, and validate the quality of the education and training services provided relative to completion rates.

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 \$7,500.00, 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.

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,



Electronic signature of Roger J. Williams, consisting of a stylized cursive script above the text "ELECTRONIC SIGNATURE".

Roger J. Williams  
Executive Director

RJW/lao

- C: Mr. Louis Farrell, Director, SEVP (louis.farrell@ice.dhs.gov)  
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