



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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May 3, 2013

VIA EMAIL & FEDERAL EXPRESS
(ggarthner@wizardutah.com)

Mr. Gilbert Gaerthner
Director of Finance
Wizard Language School
220 East 3900 South, Suite 11
Salt Lake City, UT 84107

*Re: Initial Accreditation Denied
(Appealable, Not a Final Action)
ACCET ID #1353*

Dear Mr. Gaerthner:

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 Wizard Language School, located in Salt Lake City, Utah.

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 20-21, 2013), and the institution's response to that report, dated March 27, 2013. It is noted that a number of weaknesses cited in the team report were adequately addressed in the institution's response and accepted by the Commission. However, the Commission determined that the institution has not adequately demonstrated compliance with respect to ACCET standards, policies, and procedures, relative to the following findings:

1. Standard I-B: Goals

The institution did not demonstrate that its institutional goals are understood at all levels of the organization. The team report indicated that the institutional goals are not communicated to staff or students, but kept confidential. It further indicated that the current goals do not align with the mission statement, nor do they reflect any informative convergence with ACCET's Principles of Ethics.

The institution provided three institutional goals in its response, along with a statement indicating that the goals are published in the catalog and also on the web site, and that it will make "an extra effort" to ensure that all students have a copy of the catalog. However, no copy of the catalog was provided as an exhibit, nor were the goals found on the institution's website as of the date of the Commission meeting. Further, no explanation was given as to how the three goals, the first of which was actually included in the third, support the institutional mission statement or how they align with the ACCET principles of ethics. Consequently, the Commission found that the institution's brief response provided no evidence to demonstrate that the institution has developed systematic and effective means to monitor its goals to ensure

alignment with its mission, and to disseminate the goals to staff and students. Therefore, the Commission determined that the institution failed to demonstrate compliance with this standard.

2. Standard II-C: Personnel Management; VI-B: Supervision of Instruction

The institution did not demonstrate that it implements overall written policies and procedures for the systematic and effective supervision of its staff and faculty. The team report indicated that, while the institution had a written policy and procedure for evaluation, three employees had no records of performance appraisals despite having been at the school for over a year. The rest, all contract instructors, were employed at Wizard for less than a year, but there were no classroom observation forms except for one, which was undated.

The institution indicated in its response that the three employees are all family members and therefore, have not been reviewed. These employees will be completing a “stewardship report” in June, but the response did not provide any written policy or procedures detailing the regular evaluation of staff or the implementation of the stewardship report. As for the instructors, the response stated that “an evaluation is being done at the end of the semester and during the first three weeks of the semester for new teachers,” and that the evaluations were in the instructor personnel files at the time of the on-site visit. Copies of class observations for the six contract instructors were provided. All the evaluations were signed by the instructor the day before the on-site visit took place, two of which were dated 11/30/13 by the evaluator, and the ACCET Document 21 provided by the institution for the team left the “Last Evaluation” column blank for all employees and instructors. Therefore, the institution has failed to demonstrate the systematic and effective implementation in practice over time of its policies and procedures for staff and instructor evaluation.

3. Standard IV-A: Educational Goals and Curricular Objectives; Standard IV-B, Instructional Materials

The institution did not demonstrate that its curriculum contains appropriate knowledge and skill elements to ensure adequate preparation for the expected performance outcomes. The team report indicated that the curriculum is governed primarily by the textbooks and was lacking specifically stated performance objectives. The team report further indicated that general course objectives were stated in the course syllabi, but without clear learning objectives, the team was unable to determine if the curricular content and sequencing were appropriate. Further, the lack of specific learning objectives precluded the team’s review of materials to ensure they were appropriate in scope, sequence, and depth for each proficiency level.

The institution restated the cited weakness in its response, noting that, “[A]t the time of evaluation by the ACCET team, the school’s learner’s objectives was not clearly stated in documentation. As a result, the team could not evaluate the appropriate learner performance objectives.” It stated that the institution consulted Pearson Longman and TESOL following the on-site visit to discuss aligning the school’s objectives to the Common European Framework of Reference (CEFR). It also indicated that it conducted research and consulted a professional in the area of curriculum development in order to integrate its “[p]rogram, level and course learning objectives,” with the CEFR, and provided an exhibit of its revised

level and course objectives. These exhibits included a copy of its three institutional goals, a table showing level objectives organized by skill (reading, writing, speaking, listening, and grammar), a set of overall level objective for each proficiency level, which seem to summarize the skills noted in the aforementioned table, and a copy of the “Curriculum Review Action Plan”, which is a checklist of items to be reviewed as part of a curriculum revision. The institution also revised its syllabi to include the overall course objectives. However, the CEFR, while providing a valid description of overall expected outcomes for specific proficiency levels, does not indicate the specific performance objectives that make up the core of a curriculum. For example, level 11 speaking states, “Students should be able to verbally communicate about daily events with some detail regarding clothing, attributes and immediate needs,” but does not give the specific learning outcomes that make up this broad course objective. The syllabi included as an exhibit only noted the course objective but did not contain specific performance objectives for the level. Further, the response did not include any evidence of the revision process in response to the on-site team’s findings beyond the analysis done via the “Curriculum Review Action Plan” nor any evidence that the CEFR-based curriculum has been systematically and effectively implemented in practice. Lacking evidence of specific performance objectives for each proficiency level, as well as clear evidence of the utilization of the revised curriculum and syllabi as indicated in the response, the institution has failed to demonstrate systematic and effective implementation in practice and in compliance with these standards.

4. Standard V-A: Instructional Methods

The institution did not demonstrate that its instructional methodology is consistent with current industry standards and appropriate to the educational goals and curricular objectives, or that its methods provide encouragement, motivation, and learning opportunities for all participants. The team report indicated that the institution’s stated methodology and practices, and accepted industry best practices, were not in alignment with each other as observed by the team. Instruction was instructor-lead and lecture-based rather than cooperative and student-centered.

The institution stated in its response that it consulted with Pearson Longman, TESOL and the curriculum consultant after the on-site visit, and the school reorganized the curriculum, “aligning with industry best practices and the CEFR.” The response also stated that the institution has adopted the communicative teaching method using “real-life situations that make students use their communication skills in meaningful ways,” with activities such as “collaborative problem-solving, writing for a purpose, discussion of topics of genuine interest, reading, viewing and responding to authentic materials.” However, no documentation evidencing the dramatic transformation suggested by these consultations with Pearson Longman, TESOL, and others, or any teacher meetings or training sessions was provided to support the significant change in methodology from the longstanding lecture class format to a new communicative teaching approach. The response did not include any documentation of in-service training provided to instructors who were expected to use the new approach, nor were there any classroom observations to evidence follow-up evaluations of teachers employing the new methodology. Lacking any such evidence to show the transition from the outdated methodology observed by the team, to the stated current

methodology briefly discussed in the institution's response, the systematic and effective implementation of an appropriate teaching methodology has clearly not been demonstrated in practice over time.

5. Standard VI-C: Instructor Orientation and Training

The institution did not demonstrate that it has implemented written policies and procedures for the effective orientation and ongoing professional development of instructional personnel. The team report indicated that the institution did not have written policies for instructor orientation, or written policies and procedures for instructor ongoing professional development.

The institution's response included no explanation of the lack of instructor orientation and professional growth activities at the time of the on-site visit beyond a brief, one line statement: "Specific policies are in place see attachment [sic]" and included copies of its "Teacher Observation, Training and Evaluation Policy" and its "Recruitment, Hiring, and Orientation Policy" in its response. Both are dated January 2013. The former outlines the supervisory observations conducted for new instructors, while the latter contains a policy for the orientation of new instructors. The crafting of such policies months after the ASER submission date suggests being put together at the last moment with little attention given to the systematic and effective implementation of orientation and professional growth activities in practice over time. Neither provided any guidance on the ongoing professional development of instructors. Consequently, Commission finds that the institution has failed to demonstrate compliance with this standard.

6. Standard VIII-A: Student Progress

The institution did not demonstrate that it 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 attendance was 20% of the final grade, meaning that a student who had not mastered the material at 80% could pass just by being present in class.

The institution stated in its response that attendance has been removed as a grading component in and has been replaced with a final comprehensive exam/project, which "allows a student's grade to reflect more clearly their understanding and achievements of the learning objectives." The institution provided copies of syllabi for all proficiency levels that include the new final exam/project in lieu of the attendance grade. However, effective implementation and observable results of the new final exam/project can only be demonstrated in practice over time. Therefore, the institution has not demonstrated compliance with this standard.

7. Standard VIII-B: Attendance

The institution did not demonstrate that it implements written policies and procedures for effectively monitoring and documenting attendance. The team report indicated that there was no written leave of absence/vacation policy, although the institution allowed vacations in practice, the one month off for every month of attendance is non-compliant with ACCET's policy governing vacations.

The institution's response indicated that its policy on vacations "is what is dictated by the Homeland Security Department which states that an international student on an F-1 visa needs to attend two consecutive blocks, in our case two consecutive semesters, and then the student is entitled to take one full block/semester off school." The response also stated that the institution is looking at new applications to use for its website so students can apply online, and that grades and attendance will be available online for the student to log in and review. A copy of the institution's written attendance policy was included as an exhibit. However, the narrative did not address the lack of a written policy and procedure for student vacations. Further, the reference to online applications and viewing grades and attendance online have no bearing on the cited weakness, and the attendance policy provided covers only attendance and not vacations. The response failed to address the vacation/leave of absence issue except to state its position that the institution's policy is that of DHS; it provided no written policy for student vacations and no evidence of the policy's systematic and effective implementation to demonstrate compliance with this standard consistent with Commission policy specified in Document 18.IEP – Satisfactory Progress Policy and Document 36 – Leave of Absence Policy.

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 \$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

Roger J. Williams
Executive Director

RJW/sef

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