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February 28, 2022

Dr. Chitpasong Vazquez
President and Chief Executive Officer
California Miramar University
3550 Camino Del Rio N. Suite 208
San Diego, CA 92108

Dear Dr. Vazquez

The Distance Education Accrediting Commission (the Commission) met on January 28, 2022 and considered its June 18, 2021 decision to direct California Miramar University (CMU) to show cause why its accreditation should not be withdrawn and its October 12, 2021 decision to continue the show cause directive. Upon review of the July 16, 2021 Commission letter, the November 4, 2021 Commission letter and the institution's December 6, 2021 response to the same, the Commission voted to continue the Show Cause Directive until June 2022 and to allow CMU to proceed with the total reevaluation of its compliance with DEAC accreditation standards. CMU must continue to prepare its new Self Evaluation Report (SER) and exhibits and undergo an on-site evaluation on March 16, 2022 at which time a visiting team of DEAC evaluators will seek evidence of compliance with all DEAC standards. The visiting team will pay particular attention to the standards listed below in this letter as well as the standards that were cited in the Commission letters of July 16, 2021 and November 4, 2021.

Change of Location

As part of the action to continue the total reevaluation of CMU, the Commission approved CMU to undergo a change of location for an In-Residence learning site while operating under a Show Cause Directive. CMU presented the circumstances that necessitated a change of location in its January 5, 2022 application to change an In-Residence learning site location from 16101 Old Valley Blvd., Suite A, La Puente, CA to 1720 N. Walnut Avenue, La Puente, CA. As part of its review of CMU's next SER and exhibits, DEAC evaluators will verify that the implementation of this new learning site is operating in full compliance with DEAC standards. This on-site evaluation will take place on March 17, 2022. Please also refer to DEAC's letter regarding this substantive change dated February 28, 2022.

Teach-Out Agreement

A Teach-Out Agreement provided by CMU to DEAC in accordance with Section XXI.C, Part Two, Processes and Procedures, *DEAC Accreditation Handbook*, will remain in place for students currently enrolled at CMU.

In accordance with the Commission's decision to continue the Show Cause Directive, the Commission is requiring CMU to demonstrate it fully complies with all DEAC accreditation standards with particular attention to the following areas.

1. Standard VII.A. Advertising and Promotion

The institution conforms to ethical practices in all advertising and promotion to prospective students. All advertisements, website content, and promotional literature are truthful, accurate, clear, and readily accessible to the public; proactively states that programs are offered via distance education; and appropriately discloses occupational opportunities as applicable. Catalogs, enrollment agreements, manuals, and websites list the institution's full name and physical address. At a minimum, all print advertisements and promotional literature include the institution's city, state, and website home page URL. The website home page URL, in accordance with DEAC's Website Disclosures Checklist, provides the institution's physical address. All web-based advertisements provide a link to the institution's website home page URL. All institutional social media account profiles provide a link to the institution's website home page URL. The institution complies with the DEAC's Catalog Disclosures Checklist and DEAC's Website Disclosures Checklist.

- 1. All advertisements and promotional materials accurately reflect the programs and services offered by the institution. The word "guarantee" is never used in advertisements. Under limited and exceptional circumstances, institutions may use the word "free" when it is appropriate to the mission and purpose of the institution.*
- 2. The institution's website testimonials and endorsements are truthful and less than four years old. The institution maintains signed student consent forms for each published testimonial. The institution's website discloses all program requirements, course descriptions, tuition and related costs, program schedules, method of delivery, and its catalog prior to the collection of any personal student contact information. The institution does not use other institutions as triggers for its own sponsored links on Internet search engines.*
- 3. The institution discloses in its catalog, website, and enrollment agreements that the acceptance of earned transfer credits is determined by the receiving institution.*
- 4. The institution adheres to applicable catalog, website, and enrollment agreement disclosures checklists, based on educational offerings. The institution publishes student consumer information as required by federal and state statutes and regulations.*

Standard VII.C Student Recruitment

The institution demonstrates that ethical processes and procedures are followed throughout the recruitment of prospective students by any individual who is authorized by the institution to participate in the enrollment process with prospective students. Minimum ethical practices and procedures are identified below. 1. The institution takes full responsibility for the actions, statements, and conduct of its authorized recruitment personnel. The institution maintains appropriate records, licensures, registrations, signed employment contracts, and signed DEAC Code of Ethics, as applicable for all recruitment personnel. The institution

demonstrates it adequately trains its student recruitment personnel and provides them with accurate information concerning employment and remuneration. All authorized recruitment personnel are provided with appropriate materials covering applicable procedures, policies, and presentations. The institution demonstrates that it routinely monitors its student recruitment personnel or independent organizations that provide prospective applicant names to assure that they are in compliance with all state, federal, and DEAC recruitment practices. 2. All student recruitment personnel, including telemarketing staff, conform to applicable federal, state, and international laws. Student recruitment personnel may not be given and may not use any title that indicates special qualifications for career guidance, advising, or registration, nor may they publish advertisements without written authorization from the institution. 3. If an institution provides incentives for making referrals, the incentive must not exceed a value of \$100 a year.

Standard VIII. Admission Practices and Enrollment Agreements *The institution demonstrates that ethical processes and procedures are followed throughout the recruitment of prospective students by any individual who is authorized by the institution to participate in the enrollment process with prospective students. Minimum ethical practices and procedures are identified below.*

1. The institution takes full responsibility for the actions, statements, and conduct of its authorized recruitment personnel. The institution maintains appropriate records, licensures, registrations, signed employment contracts, and signed DEAC Code of Ethics, as applicable for all recruitment personnel. The institution demonstrates it adequately trains its student recruitment personnel and provides them with accurate information concerning employment and remuneration. All authorized recruitment personnel are provided with appropriate materials covering applicable procedures, policies, and presentations. The institution demonstrates that it routinely monitors its student recruitment personnel or independent organizations that provide prospective applicant names to assure that they are in compliance with all state, federal, and DEAC recruitment practices.

2. All student recruitment personnel, including telemarketing staff, conform to applicable federal, state, and international laws. Student recruitment personnel may not be given and may not use any title that indicates special qualifications for career guidance, advising, or registration, nor may they publish advertisements without written authorization from the institution.

Admissions Criteria

The institution's admissions criteria align with its mission and student population served. The institution establishes qualifications that an applicant must possess prior to enrollment in order to successfully complete the stated educational offerings. The institution consistently and fairly applies its admission requirements. If an institution enrolls a student who does not meet the admissions criteria, the institution documents the reason(s) for the exception to the admissions criteria.

G. Enrollment Agreements

The institution's enrollment agreements/documents clearly identify the educational offering and assure that each applicant is fully informed of the rights, responsibilities, and obligations of both the student and the institution prior to applicant signature. The institution complies with the DEAC Enrollment Agreements Disclosures Checklist. Standard IX, Financial Disclosures, Cancellations and Refund Policies

In its November 4, 2021 letter, the Commission required CMU to more clearly explain and describe the operation of its sports programs and justify the manner in which CMU represented these programs in its advertising and recruitment materials. The Commission accepted CMU's explanation and noted that the institution demonstrated corrective action. The Commission will continue to monitor and evaluate CMU's compliance through its submission of its next SER, exhibits and evidence provided to the evaluation team that includes:

- Clear and conspicuous representations in all advertising, promotional and catalog materials disclosing that CMU's athletic programs are extracurricular in nature and not intercollegiate.
- A roster of currently enrolled students indicating those students who are involved in extracurricular sports programs and that indicates scholarships received to participate in the same.
- A detailed exhibit that sets forth CMU's athletic scholarship program to include the written criteria for scholarships, the procedure for determining and awarding scholarships, and the staff involved in making scholarship decisions.
- The individual responsible for Title IX coordination.
- Copies of signed Code of Ethics statements for any and all recruiters affiliated with CMU.
- Evidence that clearly documents CMU's membership in all sports leagues and associations for which CMU identifies itself as a member.

2. DEAC Accreditation Handbook, Part Two: Process and Procedures, Section III.A.3-5.

A distance education institution or provider is defined by DEAC as an educational institution or organization whose primary purpose is providing education or training that:

- 3. provides educationally sound and up-to-date curricula that are supported by quality instructional materials and appropriate technology; and*
- 4. provides continuous two-way communication on student work, e.g., evaluating students' examinations, projects, and/or answering queries, with timely feedback given to students. Furthermore,*
- 5. each program offered by the institution is predominantly distance education or correspondence education (51 percent or more);*

CMU's response to the Commission's November 4, 2021 letter still raises questions as to whether 51 percent or more of CMU's hybrid programs are offered through distance education or correspondence education as required in DEAC's eligibility standards. Specifically, many of the student activities described as "engagement" within the institution's Academic Units of Measurement chart documents are supplementary in nature and similar to activities typically associated with "preparation."

During the visit, CMU must provide documentation validating its statement that 51 percent or more of each program is offered via distance education. It is critically important that CMU clearly account for and delineate the distance education activities within the DEAC Academic Units of Measurement Chart for each program. This documentation must demonstrate that the design for each program is purposely structured to deliver the distance education majority that meets DEAC's eligibility standards cited above.

Decision Following Show Cause Remediation Period. Upon review of the application for accreditation or reaccreditation of an institution that has previously received a show cause directive, a decision is made on the institution's compliance with the accreditation standards or requirements noted in the directive. Such documentation must clarify the quality and frequency of the interactions between faculty and students for the online learning portions of each program.

The Commission may:

- vacate the show cause directive and either defer a final accreditation decision or grant accreditation or reaccreditation if it is determined that such action is warranted;
- continue the show cause directive and require the submission of additional information or further reports from the institution and/or a special visit in accordance with Section X.A.; or
- deny accreditation or withdraw reaccreditation.

Status During Pendency of Show Cause Directive. An institution under a show cause directive will retain its accreditation status unless and until the Commission decides to deny or withdraw its accreditation, as applicable. Notice of the show cause directive will be published on DEAC's website and must be included by the institution in its description of its accreditation status, in accordance with the terms of Section XV.E., Processes and Procedures.

DEAC Notification Procedure. In accordance with its procedure for Notification and Information Sharing, DEAC Accreditation Handbook, Part Two, Processes and Procedures Section XV.E.) and 34 Code of Federal Regulations §602.26(b)(1), the Commission provides written notice to the U.S. Secretary of Education, the appropriate state licensing or authorizing agencies, and the appropriate accrediting organizations at the same time it notifies the institution of the decision, but no later than 30 days after the Commission makes a decision to place an institution on Show Cause.

Disclosures to Students and Prospective Students. The Commission requires the institution that is subject to the show cause directive to disclose the action to all current and prospective students within seven business days of receipt of the written notice of the show cause order. Such notice must, at minimum, meet the requirements of Section XVI.A.2., Processes and Procedures.

Should you have any questions, please do not hesitate to contact DEAC staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Leah K. Matthews". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Leah K. Matthews
Executive Director

cc: Mr. Lucien (Skip) Capone, Chair, Distance Education Accrediting Commission