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July 16, 2021

Dr. Brian Walker
President
California Miramar University
3550 Camino Del Rio North, Suite 208
San Diego, CA 92108

Dear Dr. Walker:

The Distance Education Accrediting Commission (DEAC or the Commission) met on June 18, 2021 and considered the application for renewal of accreditation submitted by California Miramar University (CMU) and the DEAC Title IV Federal Student Aid (FSA) report pertaining to the institution's participation in FSA programs. CMU includes an in-residence site located at 16101 Old Valley Boulevard, Suite A, La Puente, California 91744.

The record before the Commission included CMU's Self-Evaluation Report (SER) and the May 6, 2021 Chair's Report and DEAC Title IV Federal Student Aid Report that summarized the findings of the evaluation team during its April 1, 2021 virtual visit. The Commission also reviewed a letter sent to CMU by DEAC staff on April 7, 2021 and CMU's May 19, 2021 response. Upon review of this record, the Commission voted to direct CMU to show cause why its accreditation should not be withdrawn. CMU must address concerns the Commission has regarding the integrity of CMU's submissions to DEAC, specifically its Self-Evaluation Report, the institution's operations, and student recruitment activities, which call into question the institution's compliance with Standards X.B., VII.A. and C., and IX.D. **CMU's responses must be submitted in accordance with the deadlines set forth in this letter. CMU is not permitted to pursue substantive changes as long as the show cause directive remains in place.**

Integrity and Accuracy of the SER

When the evaluation team reviewed CMU's Self-Evaluation Report ahead of the April 1, 2021 virtual visit, the team discovered that the SER included a significant volume of content copied from another institution's SER. By letter dated April 7, 2021, DEAC notified CMU of these findings and provided specific examples. CMU acknowledged this fact but portrayed it as an "unintentional use of another school's template" by the school's chief academic officer (CAO) acting on his own. On June 15, 2021, CMU informed DEAC that it had installed a new president and that the CAO retired effective June 15, 2021. The

Commission understands that the new president will also act as CAO. The SER and other materials submitted by CMU raised questions regarding the institution's eligibility for DEAC accreditation due to the extensive residential components of its programs.

As described in more detail below, the Chair's Report and CMU's response raise serious concerns about the institution's recruitment practices, including the manner in which the institution's athletics programs are portrayed on its website and the manner in which the institution uses its athletic programs and grants, discounts, and/or scholarship awards to recruit and incentivize the enrollment by international students.

Review of the Chair's Report and Institutional Response

Upon review of the Chair's Report from the April 1, 2021 virtual site visit and CMU's response, the Commission determined that CMU did not provide sufficient evidence that it meets the following standards. Unless otherwise noted, CMU is required to address these standards by providing responsive information and verifiable documentation of compliance with the standards by **August 31, 2021**.

1. Standard X.B. - Reputation of Institution, Owners, Governing Board Members, Officials, and Administrators

The institution and its owners, governing board members, officials, and administrators possess sound reputations, a record of integrity, and ethical conduct in their professional activities, business operations, and relations.

The Chair's Report noted that CMU utilized content from another institution in several areas of its SER. By letter dated April 7, 2021, CMU was put on notice that DEAC staff and evaluation team members had detected that certain sections of CMU's SER contained such content, specifically providing references to that content within CMU's SER. CMU was required to respond to the April 7, 2021 letter and the Chair's Report from the on-site evaluation.

The Commission reviewed CMU's response to the Chair's Report and April 7, 2021 letter and found CMU's response to be entirely unsatisfactory. While admitting that use of another institution's SER material occurred, the CMU response tried to minimize it by referring to it as "unintentional" and "use of a "template." It was neither unintentional nor use of a template. It was a direct quotation from another institution's SER by CMU's CAO, who admitted to DEAC's evaluators that his research abilities led him to that information. Equally concerning is the lack of oversight of the SER's preparation and submission by CMU's top administrators. The text copied from the other institution's SER materials could not have been overlooked by even a cursory review of the SER since that text contained the name

of the other institution on several occasions and referenced programs that were not offered by CMU.

By signing the SER, the President/CEO of CMU expressly attested that:

*The information submitted is correct
to the best of my knowledge and belief.
I understand that electronically typing my name
in this document is considered to have the same
legally binding effect as signing my signature
using a pen and paper.*

The failure of top administrators to demonstrate ownership of the SER and explain any disciplinary action against the high-level administrator who had committed the plagiarism indicates a serious lack of accountability on the part of CMU's administrative leadership.

It is worth noting that, on June 15, 2021, immediately prior to the June 2021 Commission meeting, CMU informed DEAC of the CAO's retirement and the appointment of Dr. Brian Walker to the position of president. CMU's communication to DEAC did not directly connect the announcement of these changes to resolving the ethical and oversight issues raised by its submission of an SER with plagiarized content. In fact, the letter made no mention of those issues at all. The Commission, therefore, is requiring CMU to provide verifiable documentation of the academic degrees, credentials, and qualifications listed for Dr. Brian Walker in CMU's June 15, 2021 communication to DEAC and demonstrate that Dr. Walker has established an appropriate level of supervision, leadership, and accountability for CMU. The Commission is also requiring that CMU provide written policies and procedures for ensuring that all future submissions by CMU are fully reviewed, approved, and accepted as correct by the president.

2. 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.*

and

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.

The Chair's Report directed CMU to take the following actions to demonstrate compliance with Standard VII.A.

1. Clarify the honorary nature of the doctoral degree awarded to Jean Foster and provide the name of the institution that awarded the honorary degree and a copy of the document that was awarded. Clarify how the use of the Dr. honorific when referring to Dr. Jean Foster is an appropriate representation within CMU's publications and disclosures.
2. Make consistent, clear disclosure of the location of its La Puente learning site on the institution's website and in all publications.
3. Explain how the photograph included within the pre-arrival document provided to prospective students is an accurate representation of the campus location and facilities.

The Commission reviewed CMU's response to concerns identified in the Chair's Report. Although some corrections were made, CMU's website at www.calmu.edu continues to present photographs of the campus, representations of the institution's athletic programs, and other content that does not accurately portray the institution, its location, programs, and services. The Commission undertook a comprehensive review of the entirety of CMU's website and is concerned about the accuracy and integrity of this information, the impression it creates with respect to CMU, its physical locations, and athletic program and the fact that this website content is being used to recruit students, particularly international students.

For example:

- a. The website implies that CMU is part of the United States Collegiate Athletic Association and the Pacific Coast Athletic Conference by stating that its basketball teams "play under the rules and regulations of the United States Collegiate Athletic Association (USCAA) and the Pacific Coast Athletic Conference (PCAC). Club and JV teams are under the NCBA and the NSBA." The NCBA is the National Club Baseball Association. CMU is not listed as a member.¹ DEAC researched "NSBA" to determine the identity of this organization and its relevance to CMU's representations on its website. DEAC's

¹ See <https://clubbaseball.org/league/teams/?all=true>.

research did not produce any result that indicated NSBA is associated with an organization related to collegiate or club athletics other than a non-collegiate equine association for show horses (the National Snaffle Bit Association “NSBA”).²

- b. The title tag of the CMU website currently indicates “California Miramar University | Top 5 Online Business School.” The Commission could not find any evidence or credible ranking data to support that assertion.
- c. The online catalog included on CMU’s website places great emphasis on athletics programs, to include an “Athletic Development Fee” assessment for students participating in the sports programs of \$300.00. There is no evidence that these fees are clearly and prominently disclosed to students at the time of enrollment.

The Commission is requiring CMU to respond to the concerns relating to the institution’s website representations, advertising, and recruitment activities within 15 days, i.e., no later than July 30, 2021.³ CMU must provide the following:

1. Evidence to demonstrate that CMU complies fully with DEAC’s Website Disclosures Checklist, Catalog Disclosures Checklist, and Enrollment Agreement Checklist.
2. Evidence, such as signed and dated contracts, to substantiate CMU’s arrangements with athletic facilities to provide sports programs for CMU students, including those specifically depicted on CMU’s website.
3. Evidence, such as signed membership agreements, that CMU is a member of the student athletic associations mentioned on its website and that these memberships are germane to the sports program(s) at the university.
4. The names, affiliations, and professional credentials of the coaching staff mentioned in CMU’s response and a full explanation of how the coaching staff and athletic director determine the need for and recruit students into CMU’s athletic program(s).
5. The names and qualifications of all staff or independent recruiters specifically responsible for recruiting students, including international students, into CMU’s athletic program(s).
6. Evidence that all recruitment staff have signed the DEAC Code of Ethics for Student Recruitment Personnel.

3. Standard IX.D. Discounts

² See <https://www.nsba.com/mission>.

³ Part Two, Section XXII.E.4.a, Process and Procedures, DEAC *Accreditation Handbook*.

Discounted costs are permitted for well-defined groups for specific and bona fide purposes. Discounted costs must indicate the actual reduction in the costs that would otherwise be charged by the institution. Institutions that offer discounts must demonstrate that students are enrolled in non-discounted courses or programs for a reasonably substantial period of time during each calendar year. An institution offering discounts must calculate refunds based on discounted costs. An institution that offers discounts must demonstrate that:

- *All discounts or special offers identify the specific costs for a course or program.*
- *The presentation of discounts and special offers complies with DEAC's advertising and promotion standards.*
- *All discounts (excluding those offered to well-defined groups) or special offers designate a specific expiration date and do not extend beyond the expiration date.*

The Chair's Report indicates that CMU offers "discounts" to students who are (1) evaluated to be in need of special assistance or (2) student athletes. Such discounts must be specific, published amounts. While need-based parameters may be established to make this a "well-defined group" eligible for such discounts, CMU's response does not establish clear parameters and procedures for awarding discounted tuition. The tuition discounts are not offered within a defined time period and for specific purposes. The Chair's Report directed CMU to (1) provide its standards for defining "well-defined groups" justifying need-based discounts, (2) provide a list of students awarded need-based discounts, the amount awarded, and the standards used to determine the amount of the award for the 2020-2021 award year, and (3) provide the standards used for determining discounts.

In its response, CMU listed several groups based on membership criteria that do not, in and of themselves, demonstrate that discounts are offered based on financial need. CMU provided a list of 22 students with the amount and term of the "award," the date of distribution, whether the students were Title IV recipients, their EFC number, their F1 visa status, and a statement about family hardship, e.g., "low family contribution," and EFC number characterized as "high" or "low." No information was given that identified a well-defined group. CMU described its determination of the amount of the award as being "based on both financial situations and needs of the students along with the needs of the particular sports program as presented to the COO by the various coaches." The process for determining the award begins with a coach identifying "individuals" interested in athletics who show athletic ability, educational desire, good moral character, commitment to the sport, and strong teamwork skills. The coaches communicate

their recommendations to the athletic director regarding all student discount requests. The “applicants” submit a statement consisting of goals, hurdles they have overcome, and any other important factors surrounding their potential enrollment. The COO then conducts a personal interview with each student to determine the students’ academic goals, athletic goals, financial need, and overall character make-up.

According to CMU procedures, the amount of each applicant’s tuition discount is considered on an individual basis using several factors:

- a. For Domestic Title IV students: statement of purpose, EFC #, personal interview, and family financial hardships/dynamics.
- b. For F1 International Students: statement of purpose, personal interview, additional costs associated with F1 student visa, travel, and housing costs.

Based on this information, it appears that what CMU describes as discounts are more in the nature of athletic scholarships, for which both the qualification criteria and how the institution determines the criteria are met remain unclear.

CMU must therefore provide the following information for the students listed in Exhibit IX-D in its response to the Chair’s Report. The list of students must be re-categorized according to a well-defined group and the type of discount they received. Supporting documentation must include:

1. evidence that the presentation of discounts and special offers complies with DEAC’s advertising and promotion standards;
2. evidence, including all literature provided to students enrolled during the past two years explaining discounts that would be available to them and the criteria for determining the student’s eligibility for the discount as part of a well-defined group or otherwise;
3. enrollment agreements and ledger cards showing the actual reduction in costs that would otherwise have been charged for all students listed in Exhibit IX-D;
4. a detailed explanation of how CMU determines that students are eligible for discounts/scholarships, including how the student’s financial need and the “needs” of the particular sports program are factored into discount/scholarship award decisions;
5. the specific criteria used to determine each student’s eligibility for a discount and evidence that these criteria were consistently applied to each student in Exhibit IX-D as applicable;
6. evidence, such as enrollment agreements and ledger cards, to show that CMU enrolls students in non-discounted courses or programs for a reasonably substantial period of time during each calendar year;

7. evidence, such as advertising and promotional presentations, that all discounts (excluding those offered to well-defined groups) or special offers designate a specific expiration date and do not extend beyond the expiration date; and
8. an email address for each student listed in Exhibit IX-D.

4. Standard XI.A. Financial Practices

The institution shows that it is financially responsible by providing complete, comparative financial statements covering its two most recent fiscal years and by demonstrating that it has sufficient resources to meet its financial obligations to provide quality instruction and service to its students. Financial statements are audited or reviewed and prepared in conformity with generally accepted accounting principles in the United States of America or International Financial Reporting Standards. The institution's budgeting processes demonstrate that current and future budgeted operating results are sufficient to allow the institution to accomplish its mission and goals.

and

Standard XI.C. Financial Stability and Sustainability

The institution maintains adequate administrative staff and other resources to operate effectively as a going concern and is not exposed to undue or insurmountable risk. Any risk that exists is adequately monitored, manageable, and insured. In the event the financial operations of the institution are supported by a parent company or a third party, audited or reviewed financial statements are provided by the supporting entity to demonstrate that the supporting entity possesses sufficient financial resources to provide the institution continued financial sustainability, as well as the commitment to do so. If the institution's financial performance is included within the parent corporation's statements, a supplemental schedule for the individual institution is appended to the parent statement.

The Commission is aware that CMU is subject to Heightened Cash Monitoring 1 by the U.S. Department of Education due to a composite score for the December 31, 2019 fiscal year of 1.0. The Commission considered the financial statements for this fiscal year and noted the weak financial position of the institution. CMU recorded a net income loss of \$519,843. The Commission requires updated financial information from CMU to include the following:

1. Comparative audited financial statements for the fiscal years ended December 31, 2020 and December 31, 2019.
2. The institution's budget for fiscal year 2021
3. A budget-to-actual analysis for the six months ended June 30, 2021.

5. Standard III.I. Student Integrity and Academic Honesty:

The institution publishes clear, specific, policies related to student integrity and academic honesty. The institution affirms that the student who takes an assessment is the same person who enrolled in the program and that the examination results will reflect the student's own knowledge and competence in accordance with stated learning outcomes.

2. Degree Programs

Degree-granting institutions meet this requirement by administering proctored assessments at appropriate intervals throughout the program of study and provide a clear rationale for placement of the proctored assessments within the program. Proctors use valid government-issued photo identification or other means to confirm student identity.

The Chair's Report found that CMU failed to demonstrate that it implements proctored assessments at appropriate intervals throughout the Doctor of Business Administration program and directed CMU to provide evidence of the same within its response to the Chair's Report.

In response, CMU stated that every DBA course has eight proctored multiple-choice quizzes (weighted at 12% of the course overall grade) and three proctored comprehensive examinations. However, CMU did not document the implementation of the proctored quizzes, and there is no mention of the proctored exam procedure in the DBA handbook. The Commission, therefore, requires CMU to provide the following evidence for the time frame of June 1, 2020 – May 31, 2021:

1. Dates when the proctored multiple-choice quizzes and three proctored comprehensive examinations were completed by DBA students.
2. Copies of the quizzes and examinations and the names of the DBA students who completed these assessment activities.

6. Standard III. J. Institutional Review Board

For any final research project, master's thesis, or dissertation that involves human research, the institution must require prior formal review and approval for all such research involving human subjects through an institutional review board (IRB), which has been designated to approve, monitor, and review all research involving human subjects. The IRB should ensure that the subjects are not placed at undue risk, that they have voluntarily agreed to participate, and that they have given appropriate informed consent. The IRB must meet all federal regulations, and the institution must be able to demonstrate that it is in compliance, including providing evidence that all

IRB members have had appropriate training. (Title 45 Code of Federal Regulations Part 46).

The Chair's Report directed CMU to provide evidence that it implements and documents that training is in place for all IRB faculty and committee members in accordance with DEAC standards.

In its response, CMU indicated its commitment to implementing the required IRB training for faculty and committee members. A written commitment to comply with IRB requirements is insufficient and does not demonstrate that CMU operates an IRB in accordance with DEAC standards and federal regulations for its graduate programs. The Commission is therefore requiring CMU to provide (1) a copy of the institution's policies and procedures for the IRB and (2) documentation that faculty and students have received appropriate IRB training prior to engaging in research projects involving human subjects.

7. Standard V.A. Student Achievement

The institution evaluates student achievement using indicators that it determines are appropriate relative to its mission and educational offerings. The institution evaluates student achievement by collecting data from outcomes assessment activities using direct and indirect measures. The institution maintains systematic and ongoing processes for assessing student learning and achievement, analyzes data, and documents that the results meet both internal and external benchmarks, including those comparable to courses or programs offered at peer DEAC-accredited institutions. The institution demonstrates and documents how the evaluation of student achievement drives quality improvement of educational offerings and support services.

The Chair's Report directed CMU to provide documentation to demonstrate successful student achievement in the Bachelor of Science in Business Administration (BSBA) program. The data reported within the DEAC 2020 Annual Report showed that the graduation rate is below DEAC's most recently published benchmarked standards for graduation rates in bachelor's degree programs.

In response, CMU stated that its first cohort for the new BSBA program has not had a full six years to achieve graduation. Additionally, CMU reported that four more students had graduated since the annual report was submitted, which raised the graduate rate to 61.5%; however, CMU did not provide any documentation to support this assertion. CMU must provide evidence to substantiate its compliance with the DEAC graduation rate benchmark for the BSBA program. Such evidence must include (1) a list of the students who are included within the cohort(s) reported

for the 61.5% graduate rate and (2) a copy of the CMU transcript for each student listed for the cohort(s).

8. Standard VI.C. Instructors, Faculty, and Staff

Faculty/instructors are qualified and appropriately credentialed to teach the subject at the assigned level. The institution employs a sufficient number of qualified faculty/instructors to provide individualized instructional service to each student. The institution maintains faculty/instructor résumés, official transcripts, and copies of applicable licenses or credentials on file. Faculty/instructors are carefully screened for appointment and are properly and continuously trained on institution policies, learner needs, instructional approaches and techniques, and the use of instructional technology. The institution regularly evaluates faculty and administrator performance using clear, consistent procedures. The institution assures that faculty are appropriately involved and engaged in the curricular and instructional aspects of the educational offerings. Faculty are assigned responsibilities based on their degree qualifications and/or area(s) of expertise.

1. Undergraduate Degrees Faculty teaching undergraduate degree program courses possess, at a minimum, a degree at least one level above that of the program they are teaching and demonstrate expertise in the subject field of the discipline. Faculty teaching general education courses at the undergraduate level, including occupational/technical associate degrees, must possess a master's degree in the assigned general education subject field or have a master's degree and 18 semester credit hours in the general education subject field.

2. Graduate Degrees Faculty teaching graduate-level courses in a master's degree program must possess, at a minimum, a doctoral/terminal degree earned at an appropriately accredited institution in the subject field of the discipline and demonstrate familiarity with practical applications of the field.

and

8. Professional Doctoral Degrees All teaching faculty possess terminal degrees (e.g., professional doctoral degree or Ph.D.) earned at an appropriately accredited institution in a related subject field. Prior to enrolling students, the institution has in place a dedicated dean, director, or other academic officer with credentials appropriate to the degree(s) being offered.

The Chair's Report indicated that CMU employed several faculty who did not possess the requisite appropriate degree or level of degree credential but deemed them qualified through their experience. The Chair's Report stated that, in order to demonstrate compliance with this standard, CMU must demonstrate that all faculty

meet the minimum education and experience requirements. If the institution has a faculty member who is qualified through experience but not education, then the institution must demonstrate that it implements a faculty equivalency policy and procedure in accordance with the provisions of Standard VI.C.6.

In its response, CMU described its new process and policy for demonstrating that it appropriately determines faculty qualification through experience and education. However, the documents did not provide a clear or adequate context for CMU's determinations. CMU must provide (1) documentation of the policies it uses to select and hire faculty and (2) a complete list of all faculty and course teaching assignments to include documentation that demonstrates that each instructor is qualified by credentials or by equivalency to teach the courses they are assigned. Certified credentials and official academic transcripts for each faculty member are required. CMU must also submit evidence of employment experience for each faculty member qualified by equivalency.

9. Standard II.B. Strategic Planning

The institution has a systematic process of planning for the achievement of goals that support its mission. The institution's planning process involves all areas of the institution's operations (e.g., admissions, academics, technology, etc.) in identifying strategic initiatives and goals by evaluating external and internal trends as they affect the future. At a minimum, the strategic plan addresses finances, academics, technology, admissions, marketing, personnel, and institutional sustainability. The strategic plan is reviewed and updated annually using established metrics designed to measure achievement of strategic planning goals and objectives. The plan helps institutions set priorities, manage resources, and set goals for future performance.

The Chair's Report directed CMU to complete the strategic plan document to include missing sections on its Action Plan and Operating Plan and include reports used for monitoring. CMU also needed to provide a clear definition of the metrics it uses to measure results of stated goals and objectives.

In response to the Chair's Report, CMU made updates to the Strategic Plan. However, the Commission determined that the Strategic Plan continues to lack important components necessary to meet the standard. For example, the amended plan still lacks timelines for implementation of key components. Additionally, the plan acknowledges that low enrollments have required a 15% reduction in cost of academic management and staff, and another 15% reduction is planned. Page 57 of the Strategic Plan states that CMU has "less than 80 students." The Commission is concerned that projections of such drastic enrollment decreases will impact academic quality and student achievement.

CMU must submit a revised strategic plan that includes clear and attainable strategies for addressing its enrollment challenges.

10. Standard III.D. - Comprehensive Curricula and Instructional Materials

Curricula and instructional materials are sufficiently comprehensive for students to achieve the stated program outcomes. Their organization and content are supported by reliable research and practice. The organization and presentation of the curricula and instructional materials reflect sound principles of learning and are grounded in distance education instructional design principles. The curricula and instructional materials reflect current knowledge and practice. Curricula and instructional materials are kept up-to-date, and reviews are conducted and documented on a periodic basis. Instructions and suggestions on how to study and how to use the instructional materials are made available to assist students to learn effectively and efficiently.

The institution maintains an Advisory Council for each major group of programs or major subject matter discipline it offers. The Advisory Council includes members not otherwise employed or contracted at the institution, consisting of practitioners and employers in the field for which the program prepares students. Advisory Councils:

- a. meet at least annually;*
- b. provide advice on the current level of skills, knowledge, and abilities individuals need for entry into the occupation; and*
- c. provide the institution with recommendations on the adequacy of educational program outcomes, curricula, and course materials.*

The Chair's Report directed CMU to take the following steps to demonstrate compliance with this standard.

1. Develop and document a formal course review and revision process that includes input from faculty, students, advisory committee members, and other interested parties.
2. Demonstrate that all course textbooks and materials are current based on a review consistent with its policies.
3. Provide a review calendar for the next three years indicating the dates when each course is due to be reviewed.
4. Provide meeting minutes to document that the Program Advisory Council for the Doctor of Business Administration has met.

The Chair's Report specified that the evaluation team could not verify that a formal curriculum review process is in place at CMU that includes input from faculty, students, advisory committee members, and other interested parties. Furthermore, the Chair's Report noted that textbooks and materials for many of the programs

were out of date. In response, CMU submitted documentation of a formal course review and revision process that indicated that all course textbooks and materials will be updated to be current in accordance with that process. CMU must present evidence demonstrating the implementation of that process.

11. Standard III.E. Curricula Development and Delivery

- 1. Qualified persons competent in distance education instructional design practices work with experts in subjects or fields to develop the content of all curricula and prepare instructional materials.*
- 2. The institution describes its model for distance education delivery such as: correspondence, online, or hybrid.*
- 3. Any contracting with a third party for educational delivery is conducted in accordance with DEAC Processes and Procedures, Part Two, Section XIX F.4. and F.5., Changes in Educational Offerings*

The Chair's Report directed the institution to demonstrate compliance with Standard III.E. by taking the following actions.

1. Provide evidence that qualified persons competent in distance education instructional design practices work with experts in their subjects or fields to develop the content of all curricula and prepare instructional materials. Submit certified credentials and official academic transcripts.
2. Provide a listing of subject matter experts and curriculum designer(s) responsible for the development of each course and their credentials.
3. Provide documentation demonstrating that CMU's curriculum design process as described in the curriculum design manual has been implemented.

The Chair's Report stated that CMU did not produce evidence to demonstrate that staff were qualified and competent in distance education instructional design practices and work with experts in their subjects or fields to develop the content of all curricula and prepare instructional materials. In its response, CMU stated that it hired a new director of the Center for Teaching Excellence who has experience in curriculum development. CMU presented a plan to utilize subject matter experts (SMEs) and qualified education instructional design personnel to develop any new course offerings beginning with fall 2021. CMU must present evidence of the implementation of this process and of its adequacy to comply with the standard.

Teach-out Plan and Agreement Requirements. The DEAC received a teach-out plan from CMU in response to my letter dated April 7, 2021. In addition to the items listed above, the Commission is now requiring CMU to submit teach-out agreement with an accredited institution that meets all of the criteria in the DEAC *Accreditation Handbook*, Part Two: Processes and Procedures, Section XXI.C.

The teach-out agreement is due to DEAC by August 31, 2021

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.

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.

California Miramar University

July 16, 2021

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Should you have any questions, please contact DEAC at 202-234-5100.

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: Lucien Capone, Chair, DEAC Board of Directors